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September 22, 2011

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COMMISSION CLERK

BY HAND DELIVERY

Ms. Ann Cole, Director
Commission Clerk and Administrative Bureau
Room 110, Easley Building
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, Florida 32399-0850

110000-05

X
claim of confidentiality
notice of intent
request for confidentiality
filed by OPC

For DN 06882-11, which is in locked storage. You must be authorized to view this DN.-CLK

Re: Nexus Communications, Inc. d/b/a Nexus Communications TSI, Inc.'s
Response to FPSC Staff's Link-Up and Lifeline Data Request

Dear Ms. Cole:

Nexus Communications, Inc. d/b/a Nexus Communications TSI, Inc. ("Nexus"), pursuant to Section 364.183(1), Florida Statutes, hereby claims that certain information provided in its Response to FPSC Staff's Link-Up and Lifeline Data Request contains confidential customer information that should be held exempt from public disclosure. Pursuant to Rule 25-22.0065(3), Florida Administrative Code, the attached envelope contains the documents with the confidential information highlighted.

Please acknowledge receipt of this letter by stamping the extra copy of this letter as filed and return to me in the same.

Thank you for your assistance in this filing.

Sincerely,

Floyd R. Self

FRS/amb
Enclosure
cc: Ms. Beth Salak

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CLEC AND WIRELESS LINK-UP AND LIFELINE DATA REQUEST 2011

To assist the Public Service Commission (Commission) in the development of our Annual Report to the Governor, President of the Senate, and Speaker of the House of Representatives on the Link-Up and Lifeline programs as required by Chapter 364.10, Florida Statutes, **staff requests that you provide responses to the following by September 19, 2011.**

For items 1 through 16, please provide the data for the fiscal year July 1, 2010, through June 30, 2011.

For those items requesting that the data be reported on a monthly basis, provide the appropriate number as of the last day of each month during the review period.

1. The number of residential access lines in service each month.

The number of Florida residential access lines in service for each month is indicated following:

| Month | Year | Number of Residential Access Lines |
|-----------|------|------------------------------------|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
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2. The number of customers participating in Lifeline each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

The number of Non-Transitional Lifeline and Non-Resold Florida customers participating in Lifeline each month is indicated following:

| Month | Year | Number of Customers Participating Through Means other than Transitional Lifeline or Resold Access Lines |
|-----------|------|---|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

3. The number of customers participating in Link-Up each month. Note: Do not include customers receiving Link-Up through resold access lines.

The number of Non-Resold Florida customers participating in Link-Up each month is indicated following:

| Month | Year | Number of Non-Resold Customers Participating in Link-Up |
|-----------|------|---|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

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4. The number of customers denied Lifeline service. Identify the reason(s) customers were denied Lifeline (i.e. customer currently receiving Lifeline, inability to verify participation in a qualifying program, past due balance, other reasons not listed).

The number of Florida customers denied Lifeline service each month and the reason for denial is indicated following:

| Month | Year | Number of Customers Denied Lifeline | Reasons for Denial |
|-----------|------|-------------------------------------|--------------------|
| July | 2010 | | |
| August | 2010 | | |
| September | 2010 | | |
| October | 2010 | | |
| November | 2010 | | |
| December | 2010 | | |
| January | 2011 | | |
| February | 2011 | | |
| March | 2011 | | |
| April | 2011 | | |
| May | 2011 | | |
| June | 2011 | | |

5. The number of Lifeline customers added each month. Note: Do not include customers receiving Lifeline through the Transitional Lifeline provision or resold access lines.

The number of Non-Transitional Lifeline and Non-Resold Florida Lifeline customers added each month is indicated following:

| Month | Year | Number of Non-Transitional and Non-Resold Lifeline Customers Added |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

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6. The number of Link-Up customers added each month. Note: Do not include customers receiving Link-Up through resold access lines.

The number of Non-Resold Florida Link-Up customers added each month is indicated following:

| Month | Year | Number of Non-Resold Link-Up Customers Added |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

7. The number of customers removed from Lifeline each month. Note: Do not include Lifeline customers removed from resold access lines.

The number of Non-Resold Florida customers removed from Lifeline each month is indicated following:

| Month | Year | Number of Non-Resold Customers Removed from Lifeline |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

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8. The number of Lifeline customers subscribing to bundled service packages each month. Please list each bundled package separately including the ancillary services contained in each.

The number of Florida Lifeline customers subscribing to bundled service packages each month is indicated following:

| Month | Year | Number of Lifeline Customers Subscribing to Bundled Services |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

9. The number of customers participating in Transitional Lifeline each month.

The number of Florida customers participating in Transitional Lifeline each month is indicated following:

| Month | Year | Number of Customers Participating in Transitional Lifeline |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

10. The number of customers participating in Lifeline under the Tribal Lands provision each month.

The number of Florida customers participating in Lifeline under the Tribal Lands provision each month is indicated following:

| Month | Year | Number of Customers Participating Under Tribal Lands Provision |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

11. The number of Lifeline customers added each month through the income-based enrollment process.

The number of Florida Lifeline customers added each month through the income-based enrollment process is reported following:

| Month | Year | Number of Lifeline Customers Added Through Income-Based Enrollment Process |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

12. The number of Lifeline customers added each month through the program-based enrollment process.

The number of Florida Lifeline customers added each month through the program-based enrollment process is indicated following:

| Month | Year | Number of Lifeline Customers Added Through Program-Based Enrollment Process |
|-----------|------|---|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

13. The number of Lifeline customers added each month through the Commission's on-line enrollment process.

The number of Florida Lifeline customers added each month through the Commission's on-line enrollment process is indicated following:

| Month | Year | Number of Lifeline Customers Added Through Commission's On Line Process |
|-----------|------|---|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

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14. The number of Lifeline customers added each month through the Department of Children and Families (DCF) automatic enrollment process.

The number of Florida Lifeline customers added each month through the Department of Children and Families (DCF) automatic enrollment process is indicated following:

| Month | Year | Number of Lifeline Customers Added Through DCF Auto Enrollment Process |
|-----------|------|--|
| July | 2010 | |
| August | 2010 | |
| September | 2010 | |
| October | 2010 | |
| November | 2010 | |
| December | 2010 | |
| January | 2011 | |
| February | 2011 | |
| March | 2011 | |
| April | 2011 | |
| May | 2011 | |
| June | 2011 | |

15. The number of access lines with Lifeline resold to other carriers each month. Identify each carrier separately by name or certificate number.

Not applicable. Nexus does not provide resold access lines to other carriers.

16. Description of your company's procedures for enrolling customers in the Link-Up and Lifeline programs (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:

- a. Procedures used to process applications received from the Office of Public Counsel.

Same as 2010.

- b. Procedures used to process applications received directly from customers.

Same as 2010.

- c. Procedures used to process applications received through the PSC on-line process.

Same as 2010.

- d. Procedures used to process applications received through the DCF automatic enrollment process.

Same as 2010.

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- e. The amount of time required to process applications. Include time period between receipt of customer application and the billing date of the first bill providing the credit.
Same as 2010.
- 17. Description of your company's procedures for performing continued verification of customer eligibility after initial certification (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:
 - a. Time period between initial certification and verification.
Same as 2010.
 - b. If allowed, the statistical sampling method(s) used to verify customer eligibility.
Same as 2010.
 - c. Frequency of periodic verification.
Same as 2010.
- 18. Description of each bundled service offering available to Link-Up and Lifeline customers (if same as 2010 response, just note "**Same as 2010**"). Include the following in your response:
 - a. Applicable recurring and nonrecurring charges.
Same as 2010.
 - b. Any policy for allowing payment of local usage component of bundled service offering by Lifeline customers to avoid disconnection.
Same as 2010.
 - c. Any terms and conditions applicable to Lifeline customers that would not apply to general service offering customers.
Same as 2010.
- 19. Description of your company's procedures for promoting Link-Up and Lifeline (if same as 2009 response, just note "**Same as 2010**"). Include the following in your response:
 - a. Internal procedures for promoting Link-Up and Lifeline.
Same as 2010.
 - b. Outreach and educational efforts involving participation in community events.
Same as 2010.

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- c. Outreach and educational efforts involving mass media (newspaper, radio, television).

Same as 2010.
 - d. Copies of Link-up and Lifeline outreach materials of your company.

Same as 2010.
 - e. Organizations you are currently partnering with, have partnered with, and organizations you plan to partner with to educate and inform customers about Link-Up and Lifeline.

Same as 2010.
20. Description of procedures associated with enrollment of Link-Up and Lifeline customers by resellers of telecommunications services through resale agreements. Include the following in your response:
- a. Billing procedures associated with the pass through of the credit, including the amount of the pass through for each reseller.

Not applicable. Nexus does not provide lines on a resale basis to other carriers.
 - b. Certification and verification procedures and requirements.

Not applicable. Nexus does not provide lines on a resale basis to other carriers.
 - c. Any other terms and conditions applicable to resellers offering Link-Up and Lifeline that are not imposed on resellers who do not offer Link-Up and Lifeline.

Not applicable. Nexus does not provide lines on a resale basis to other carriers.
21. Please describe the training you provide to your customer service representatives regarding Link-Up and Lifeline and provide the script used by your company's representatives.
- All customer service representatives receive initial as well as ongoing training, thereby allowing the representative to provide information to potential applicants. Training is provided in a classroom environment and the information contained in the Company's compliance manual that pertains to Lifeline and Link-Up is covered. In addition, advancement and increases are merit based and are designed to establish expertise with all Company policies and procedures including familiarity with Lifeline and Link-Up eligibility on a state-by-state basis.
22. Please describe the circumstances in which customer service representatives advise customers that Lifeline and Link-Up is available.
- Customer service representatives advise potential as well as existing non-Lifeline customers as to the availability of Lifeline and Link-Up. Representatives are trained to provide all customers with information about the Lifeline and Link-Up programs

including, but not limited to, eligibility requirements, certification procedures and the amount of Lifeline and Link-Up support provided. In addition, representatives are authorized to provide monthly recurring credits to existing accounts once eligibility has been established.

23. Please provide any link on your Web site that provides Lifeline information.

Lifeline information is available at www.tsihomephone.com/lifeline.

24. Does your company provide Lifeline services using its own facilities? If so, describe the facilities in detail, and provide the number of customers provided Lifeline service through these facilities each month.

As required by 47 C.F.R. § 54.201(d)(1) Nexus "[o]ffers the services that are supported by federal universal service support mechanisms...either using its own facilities or a combination of its own facilities and resale of another carriers services," which includes the offering of programs such as Lifeline to eligible low-income consumers.

Consistent with the definition of 47 C.F.R. § 54.201(f) these facilities are unbundled network elements (UNEs) obtained from [REDACTED] through the Company's current and effective [REDACTED]. As these UNEs are "physical components" of Nexus' "telecommunications network that are used in the transmission or routing of the services that are designated for support" they meet the definition of "facilities" enumerated in 47 C.F.R. § 54.201(e).

25. Does your company provide Lifeline services using unbundled network elements leased from an ILEC? If so, identify the ILECs, and the number of UNE lines leased each month from each.

[REDACTED]

[REDACTED]

26. Does your company provide Lifeline services using resale Lifeline/Link-Up lines obtained from an underlying carrier? If so, identify the underlying carrier and the number of resale Lifeline lines obtained each month.

Yes. Consistent with 47 C.F.R. § 54.201(d)(1), Nexus "offers the services that are supported by federal universal support mechanisms," including lifeline, "either using its own facilities or a combination of its own facilities and resale of another carrier's services." The number of Resale Lifeline lines obtained each month from [REDACTED]

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| | | |
|------------|------------|------------|
| [REDACTED] | [REDACTED] | [REDACTED] |

27. Does your company receive reimbursement for Toll-Limitation Services (TLS)? If so from who? List a breakdown of incremental costs claimed for providing TLS.

[REDACTED]

[REDACTED]