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January 13, 2012

**Via eFiling and First Class Mail**

Rosemary Chiavetta, Secretary  
Pennsylvania Public Utility Commission  
400 North Street, Keystone Bldg., 2<sup>nd</sup> Fl.  
Room N201  
Harrisburg, PA 17105-3265

**Re: In the Matter of a Petition by dPi Teleconnect, LLC For Designation as an Eligible  
Telecommunications Carrier in the Commonwealth of Pennsylvania for the Limited  
Purpose of Offering Lifeline and Link-Up Services to Qualified Households  
NEW FILING**

Dear Secretary Chiavetta:

On behalf of dPi Teleconnect, LLC, we are filing an original and three (3) copies of the above-captioned Petition. An electronic copy is being filed through the Commission's eFiling portal.

Thank you for the Commission's consideration. If you have any questions or require additional information, please feel free to contact me at your convenience.

Sincerely,

A handwritten signature in blue ink that reads "Bradford M. Stern". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Bradford M. Stern

Enclosures

cc: Certificate of Service

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**In the Matter of a Petition by dPi Teleconnect, )  
LLC For Designation as an Eligible )  
Telecommunications Carrier in the ) Docket No. P-2012 \_\_\_\_\_  
Commonwealth of Pennsylvania for the )  
Limited Purpose of Offering Lifeline and )  
Link-Up Services to Qualified Households )**

**CERTIFICATE OF SERVICE**

I hereby certify that on this 13<sup>th</sup> day of January, 2012, copies of the foregoing Petition as above-captioned have been served upon the persons or organizations listed below via First Class U.S. Mail in accordance with the requirements of 52 Pa. Code Sections 1.54 and 1.55.

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Harrisburg, PA 17101-1921

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Commerce Building, Suite 1102  
300 North Second Street  
Harrisburg, PA 17101



Bradford M. Stern

Dated: January 13, 2012

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**PETITION OF DPI TELECONNECT, LLC FOR DESIGNATION  
AS AN ELIGIBLE TELECOMMUNICATIONS CARRIER  
IN THE COMMONWEALTH OF PENNSYLVANIA FOR THE LIMITED PURPOSE OF  
OFFERING LIFELINE AND LINK-UP SERVICES TO QUALIFIED HOUSEHOLDS**

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*Counsel for dPi Teleconnect, LLC*

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dPi Teleconnect, LLC (“dPi” or the “Company”), by its undersigned counsel pursuant to Section 214(e)<sup>1</sup> of the Telecommunications Act of 1996 (the “1996 Act”) and the implementing rules of the Federal Communications Commission (“FCC”), and 66 Pa. C.S. § 3019(f) and the implementing rules of the Pennsylvania Public Utilities Commission (“PUC” or “Commission”),<sup>2</sup> hereby requests that the Commission designate dPi as an Eligible Telecommunications Carrier (“ETC”) for the purpose of receiving federal low income universal service support for wireline services. dPi does not at this time seek ETC designation for the purpose of receiving federal universal service support for providing service to high cost areas.

dPi is requesting ETC designation for an area of service in the Commonwealth that overlaps the service territories of the following telephone companies (collectively, the “Service Area”):

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<sup>1</sup> 47 U.S.C. § 214(e).

<sup>2</sup> 52 Pa. Code § 69.2501 (the “Commission Rules”).

- Verizon North, Inc.
- Verizon Pennsylvania, Inc.
- United Telephone Company Of Pa d/b/a CenturyLink

dPi does not by this Petition request that the Commission modify, or seek in any way to affect, the definition of rural telephone company study areas in the Commonwealth.

In connection with this petition, dPi files for approval proposed tariff sheets for Lifeline Service and Link-Up Service, consisting of Section 7, Original Page 3 through Section 7, Original Page 9, as provided in Exhibit A. If approved, these tariff sheets will be inserted into dPi's Competitive Local Exchange Carrier Tariff filed with the Commission.<sup>3</sup>

In further support of its Petition, dPi states as follows:

**I. GENERAL INFORMATION; PLAN OFFERINGS.**

**A.** dPi is a Delaware Limited Liability Company with its principal offices located at 1330 Capital Parkway, Carrollton, Texas 75006. A copy of dPi's authorization to transact business in Pennsylvania is attached hereto as Exhibit B.

dPi is authorized as a facilities-based and resold competitive local exchange carrier (CLEC) by the Commission to provide local services within the entirety of the above-described Service Area.<sup>4</sup> dPi has approved Interconnection Agreements with each incumbent local

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<sup>3</sup> dPi's current tariff is Telephone Pa. P.U.C. Tariff No.1 - Local. dPi currently has filed in Docket No. R-2011-2279178 Telephone Pa. P.U.C. Tariff No. 3 – Local, with 30 days' notice of January 20, 2012 to replace P.U.C. Tariff No. 1 – Local. The tariff sheets provided in Exhibit A are incorporated into the pending tariff. dPi has requested the Commission to suspend in Docket No. R-2011-2279178 the effective date of the tariff sheets shown in Exhibit A, instead to be made effective upon filing per the Commission's ETC designation sought herein.

<sup>4</sup> *Application of DPI Teleconnect, LLC., for Approval of the Right to Begin to Offer, Render, Furnish, or Supply Telecommunication Services As a Non-Facilities-Based Competitive Local Exchange Carrier, to the Public, within the Service Territories of Verizon Pennsylvania, Inc., Verizon North, Inc., and Sprint/United, Docket No. A-310804, July 11, 2002; Re: Letter Petition to modify Certificate of Public Convenience of dPi Teleconnect, LLC, to operate as a facilities-based Competitive Local Exchange Carrier, Secretarial Letter, A-310804, March 23, 2004.*

exchange carrier located in the above-described Service Area, and purchases unbundled network elements (“UNEs”) and services there under.<sup>5</sup>

**B.** dPi is authorized to provide facilities based and/or resold local and long distance services in 41 other states, including the Commonwealth.

**C.** dPi provides local, long-distance and related services, currently on a pre-paid basis only, in the Commonwealth in accordance with the terms of its CLEC Tariff. Lifeline customers will receive all of the offered services set forth in Section 5 of the CLEC Tariff for Residential Basic Line Service that are available to all offered Service Packages, and will receive the specific, additional services available based on the customer’s choice of one of three offered, pre-paid Service Packages (Basic, Advantage and Premier). Provided in Exhibit C are the Tariff sheets for Section 5 (as pending in Docket No. R-2011-2279178) describing the foregoing service offerings. Lifeline customers would pay the applicable monthly rate of the selected Service Package, pursuant to Section 7.1.1 of the Tariff (also provided in Exhibit C), less the applicable Lifeline discounts described in Section 7.3.3 of the Tariff (provided in Exhibit A).

**D.** Pursuant to Section 7.4.3 of the proposed CLEC Tariff, dPi will reduce the Service Connection Charge for qualifying Link-Up customers by up to \$30 (see Exhibit A, Section 7, Original Page No. 9). dPi will permit the balance of the Service Connection Charge due to be paid in monthly installments, without interest.

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<sup>5</sup> *Joint Petition of The United Telephone Company of Pennsylvania d/b/a Sprint and dPi Teleconnect, LLC*, Docket No. A-310804F7002, Order and Opinion, July 9, 2004; *Joint Petition of Verizon North Inc. and dPi Teleconnect, LLC*, A-310804F7001, Opinion and Order, May 23, 2003; *Joint Petition of Verizon Pennsylvania Inc. and dPi Teleconnect, LLC*, A-310804F7000, Opinion and Order, May 23, 2003.

**E.** Correspondence or communications pertaining to this Petition should be directed to dPi's attorneys of record:

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Bradford M. Stern Law Offices  
22 Lakeview Hollow  
Cherry Hill, NJ 08003

Telephone: (856) 520-6806  
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**F.** Questions concerning the ongoing operations of dPi following ETC designation should be directed to the above referenced counsel and to:

Mr. Charles M. Hartley  
Vice President, Operations  
dPi Teleconnect, LLC  
1330 Capital Parkway  
Carrollton, TX 75006  
Telephone: P: (972) 488-5500 X4001  
Email: [chuck.hartley@dpiteleconnect.com](mailto:chuck.hartley@dpiteleconnect.com)

## II. BACKGROUND.

Section 254 of the 1996 Act provides for universal service. Universal service is a principal component of federal telecommunications policy, and the FCC has adopted a number of cost recovery policies and mechanisms designed to ensure access to basic telecommunications services at affordable prices for all Americans.

One key component of universal service is the availability of subsidies from the federal Universal Service Fund (“USF”), created by the 1996 Act. The USF was created, in part, to provide support to qualifying low-income communications end-users such as those serviced by dPi. Mechanisms were also established in an effort to moderate the amount of costs to be recovered through basic, recurring charges to low-income users, thereby assisting efforts to maintain reasonable basic rate levels. Only a “common carrier” receiving designation as an ETC under 47 U.S.C. § 214 is eligible to receive subsidies from the federal USF. Common carriers that provide services consistent with the requirements of Section 214(e) may be deemed ETCs.<sup>6</sup>

Section 214(e)(2) of the 1996 Act<sup>7</sup> provides that:

A State commission shall upon its own motion or upon request designate a common carrier that meets the requirements of paragraph (1) as an eligible telecommunications carrier for a service area designated by the State commission. Upon request and consistent with the public interest, convenience, and necessity, the State commission may, in the case of an area served by a rural telephone company, and shall, in the case of all other areas, designate more than one common carrier as an eligible telecommunications carrier for a service area designated by the State commission, so long as each additional requesting carrier meets the requirements of paragraph (1). Before designating an additional eligible telecommunications carrier for an area served by a rural telephone company, the State commission shall find that the designation is in the public interest.

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<sup>6</sup> U.S.C. § 214(e)(6) provides that wireless carriers not otherwise subject to state commission jurisdiction shall be designated as ETCs if they meet the requirements of 47 U.S.C. § 214(e)(1) consistent with applicable federal and state law.

<sup>7</sup> 47 U.S.C. § 214(e)(2).

Section 214(e)(1) of the 1996 Act<sup>8</sup> provides:

A common carrier designated as an eligible telecommunications carrier under paragraph (2), (3), or (6) shall be eligible to receive universal service support in accordance with section 254 of this title and shall, throughout the service area for which the designation is received—

(A) offer the services that are supported by Federal universal service support mechanisms under section 254 (c) of this title, either using its own facilities or a combination of its own facilities and resale of another carrier's services (including the services offered by another eligible telecommunications carrier); and

(B) advertise the availability of such services and the charges therefore using media of general distribution.

The FCC has promulgated rules governing ETC designations, set forth at 47 C.F.R. § 54.101, §§ 54.201-203, and §§ 54.205-209 (the “FCC Rules”) to establish various requirements for carriers to meet before receiving ETC status.<sup>9</sup> The Commission Rules require that petitioners seeking ETC status in the Commonwealth address and satisfy each of the ETC designation criteria under the FCC Rules (or if any criterion is inapplicable, provide support thereof).<sup>10</sup>

dPi requests by this Petition ETC status solely to provide Lifeline and Link-Up support to qualifying low-income customers throughout its Service Area. It is seeking ETC designation solely on a wireline basis. dPi does not request ETC status for the purpose of participating in any high cost programs of the USF.

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<sup>8</sup> 47 U.S.C. § 214(e)(1).

<sup>9</sup> The FCC recently revised Sections 54.101 and 54.202 of the above-cited FCC Rules. *Report and Order and Further Notice of Proposed Rulemaking In the Matter of Connect America Fund*, WC Docket No. 10-90; *A National Broadband Plan for Our Future*, GN Docket No. 09-51; *Establishing Just and Reasonable Rates for Local Exchange Carriers*, WC Docket No. 07-135; *High-Cost Universal Service Support*, WC Docket No. 05-337; *Developing an Unified Intercarrier Compensation Regime*, CC Docket No. 01-92; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Lifeline and Link-Up*, WC Docket No. 03-109; and *Universal Service Reform – Mobility Fund*, WT Docket No. 10-208, released November 18, 2011 (“USF/ICC Transformation Order”); *Order on Reconsideration*, released December 23, 2011.

<sup>10</sup> The Commission Rules also require satisfaction of the FCC's criteria and standards for ETC designation criteria found in Universal Service Order, Report and Order at CC Docket No. 96-45 (May 8, 1997), and in the FCC's Report and Order at CC Docket No. 96-45 (March 17, 2005). 52 Pa. Code § 69.2501(a).

ETC designation will enhance dPi's ability to provide service to low income consumers within the Service Area, and since this Petition is for the purpose of receiving low income universal service support, dPi's wireline offering will supplement and not detract from the provision of supported services in such area.

Upon designation as an ETC, dPi will make Lifeline and Link-Up service available to qualifying customers in the Service Area pursuant to the guidelines and requirements of the universal service program and 47 C.F.R. §§ 54.202(a), 66 Pa. C.S. § 3019(f) and 52 Pa. Code § 69.2501.<sup>11</sup>

### **III. DPI MEETS THE REQUIREMENTS OF THE FCC'S RULES FOR DESIGNATION AS AN ETC IN THE COMMONWEALTH.**

As demonstrated below, dPi meets the applicable requirements under the FCC's Rules for receiving ETC designation by the Commission pursuant to Section 214(e)(2) of 1996 Act.<sup>12</sup> In addition, dPi complies with the standards established by the FCC for determining whether applicants for ETC status serve the public interest.<sup>13</sup>

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<sup>11</sup> As dPi does not seek federal universal service funding support for the provision of broadband services, only for Lifeline and Link-Up support, it is not submitting to the Commission a five-year build-out plan for broadband facilities. See, 47 C.F.R. § 54.202(a)(ii) and *USF/ICC Transformation Order*, at ¶ 587, which states:

“Build-out/Service. Recognizing that existing five-year build out plans may need to change to account for new broadband obligations set forth in this Order, we require all ETCs to file a new five-year build-out plan in a manner consistent with 54.202(a)(1)(ii) by April 1, 2013. Under the terms of new section 54.313(a), all ETCs will be required to include in their annual 54.313 reports information regarding their progress on this five-year broadband build-out plan beginning April 1, 2014. This progress report shall include the number, names, and addresses of community anchor institutions to which the ETCs newly offer broadband service. As discussed above, we expect ETCs to use their support in a manner consistent with achieving universal availability of voice and broadband. Incumbent carriers, both rate-of-return and price cap, should make certifications to that effect beginning April 1, 2013 for the 2012 calendar year.”

<sup>12</sup> 47 U.S.C. § 214(e)(2).

<sup>13</sup> See Federal-State Joint Commission on Universal Service, *Report and Order*, CC Docket No. 96-45, 20 FCC Rcd 6371, ¶ 40-43 (Rel, March 17, 2005).

**A. dPi Will Offer All of the Required Services and Functionalities to Receive Lifeline and Link Up Support.**

The FCC Rules require that an ETC “must offer voice telephony . . . in order to receive federal universal service support.”<sup>14</sup> The FCC has established that

“[T]he functionalities of eligible voice telephony services include voice grade access to the public switched network or its functional equivalent; minutes of use for local service provided at no additional charge to end users; access to the emergency services provided by local government or other public safety organizations, such as 911 and enhanced 911, to the extent the local government in an eligible carrier’s service area has implemented 911 or enhanced 911 systems; and toll limitation for qualifying low-income consumers (as described in subpart E of this part).”<sup>15</sup>

As an authorized, facilities-based CLEC in the Commonwealth, dPi will provide all of the above-stated functionalities of voice telephony services to its Lifeline customers. Furthermore, dPi will provide these services primarily through use of facilities-based unbundled network elements (“UNEs”) and services available through the three Commission-approved Interconnection Agreements referenced above (collectively, the “dPi Network”).<sup>16</sup> Thus, dPi satisfies the requirements for an ETC to provide the voice telephony services through(at least in part) its “own facilities.”<sup>17</sup>

**B. dPi’s Lifeline Service Will Remain Functional in Emergency Situations.**

Under the FCC Rules, an ETC applicant must demonstrate its ability to remain functional in emergency situations<sup>18</sup>. As dPi will be providing Lifeline services primarily through facilities-

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<sup>14</sup> 47 C.F.R. § 54.101(b).

<sup>15</sup> 47 C.F.R. § 54.101(a).

<sup>16</sup> Pursuant to 47 C.F.R. § 54.201(f), obtained facilities-based unbundled network elements constitute “own facilities” for purposes of determining ETC status.

<sup>17</sup> See 47 U.S.C. § 214(e)(1)(A), and 47 C.F.R. §§ 54.201(e) and (f); see also *Universal Service Order*, 12 FCC Rcd 8853, FCC97-157 (“USF Order”), at ¶ 169.

<sup>18</sup> 47 C.F.R. § 54.202(a)(2).

based UNEs, dPi will also have access to and the benefit of the underlying ILEC's emergency functionality..

**C. Service Quality Commitments.**

An ETC applicant must demonstrate that “it will satisfy applicable consumer protection and service quality standards.”<sup>19</sup> As an authorized CLEC in the Commonwealth, dPi is subject to the Commission's applicable consumer protection and service quality standards. These standards will apply, as a condition of maintaining CLEC authority, to dPi's Lifeline services no differently than as these standards currently apply to all of dPi's residential local exchange services. Thus, dPi meets these requirements for receiving ETC designation.

**D. dPi Will Advertise the Availability of Supported Services.**

ETCs must advertise the availability of, and the prevailing prices for, the universal services throughout the area in which they have been designated an ETC.<sup>20</sup> dPi will comply with the requirement regarding advertisement, and dPi will utilize all universal service support for the provision, maintenance, and upgrading of the supported services. dPi will announce and advertise telecommunications services as an ETC where it provides service in its Service Area and will publicize the availability of Lifeline and Link-Up services in a manner reasonably calculated to reach those likely to qualify for those services. Accordingly, more low-income Pennsylvania residents will be made aware of the opportunities afforded to them under the Lifeline and Link-Up programs and will be able to take advantage of those opportunities by subscribing to dPi's service.

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<sup>19</sup> 47 C.F.R § 54.202(a)(3).

<sup>20</sup> 47 U.S.C. § 214(e)(1)(B).

**E. dPi Will Comply with the Certification and Verification Requirements under 47 C.F.R. § 54.410.**

The FCC Rules require each ETC to comply with certification of eligibility and verification of continued eligibility for participation in the Lifeline program.<sup>21</sup> dPi has internal controls in place to prevent subscribers from receiving more than one lifeline discount consistent with federal requirements.<sup>22</sup> dPi requires customers to self-certify at the time of service activation and annually thereafter that they: 1) are the head of household; 2) participate in one of the state-approved means tested programs; 3) will be receiving Lifeline-supported services only from dPi; 4) do not currently receive Lifeline support; and 5) will notify dPi in the event that they no longer participate in the qualifying program. Verification of continued eligibility is accomplished by dPi's annual certification/verification process. Pursuant to 47 C.F.R. § 54.416, dPi also will comply with the certification and verification requirements in connection with its Link-Up program. dPi also will comply with Pennsylvania's specific requirements, as described in Section VI(B) below.

**F. Annual Reporting Requirements.**

dPi will comply with the annual reporting requirements contained in 47 C.R.R. § 54.209, as and to the extent applicable.

**IV. DESIGNATION OF DPI AS AN ETC IS IN THE PUBLIC INTEREST OF THE COMMONWEALTH AND ITS LOW-INCOME TELECOMMUNICATIONS END-USERS.**

Under the 1996 Act, “[u]pon request and consistent with the public interest, convenience and necessity” the Commission shall “designate more than one common carrier as an eligible

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<sup>21</sup> 47 C.F.R. § 54.410.

<sup>22</sup> It is important to note that dPi generally does not have access to the customer lists of other ETCs, and thus cannot cross-check its customer lists against any other ETCs customer list.

telecommunications carrier for a service area designated<sup>23</sup> by the Commission. In doing so, the Commission “shall find that the designation is in the public interest”.<sup>24</sup>

Based on the foregoing, dPi submits that its designation as an ETC in the Commonwealth meets the “public interest” standards established by the FCC, and the Commission should find as such. dPi provides the following information which demonstrates that dPi’s designation as an ETC is consistent with the public interest, convenience and necessity by providing consumers with increased competitive choice through the offering of a unique service.

**A. Increased Competitive Choice.**

The FCC has determined that while designation of competitive ETCs promotes and benefits consumers by increasing customer choice, designation must include “an affirmative determination that such designation is in the public interest regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.”<sup>25</sup> dPi is seeking ETC designation, which will provide an additional valuable alternative to the existing telecommunications services currently available in these areas and will promote competition and facilitate the provision of advanced communications services to low-income residents of Pennsylvania.

Designation of the Company as an ETC will also provide other carriers serving the same area an incentive to improve their existing networks and service offerings in order to remain competitive, which will result in improved consumer services and will also benefit consumers by

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<sup>23</sup> 47 U.S.C. § 214(e)(6), made applicable to state commissions pursuant to 47 C.F.R. 54.201(c).

<sup>24</sup> *Id.*

<sup>25</sup> *See* Federal-State Joint Commission on Universal Service, 20 FCC Rcd 6371, ¶ 42 (2005).

allowing dPi to offer the services designated for support at rates that are “just, reasonable, and affordable.”<sup>26</sup>

As provided by the Communications Act, the availability of basic telecommunications services to low-income consumers is critical to the provision of public health, safety, and other services. In addition, the FCC has long acknowledged the benefits to consumers of being able to choose from a variety of telecommunications providers and the resulting variety of telecommunications services they provide.<sup>27</sup> The Lifeline and Link-Up service offered by dPi also provides important benefits that are especially needed by low-income Pennsylvania residents in this time of economic downturn. As of June, 2011, Pennsylvania’s unemployment rate is reported to be 7.6 percent,<sup>28</sup> which has a significant impact on many residents of the Commonwealth.

The economic circumstances indicate that low-income individuals, now more than ever, can greatly benefit from the advantages offered by dPi’s Lifeline and Link-Up service thus allowing those adversely impacted by the failing economy or job loss to have access to a free service to assist in emergency situations, facilitate job search efforts, and to maintain contact with family members.

dPi expects these additional competitive advantages to create an atmosphere that will cause many qualified consumers, at their option, to select the Company’s low income Lifeline and Link-Up service in lieu of the more traditional services.

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<sup>26</sup> See, 47 U.S.C. § 254(b)(1).

<sup>27</sup> See e.g., *Specialized Common Carrier Services*, 29 FCC 2d 870 (1971).

<sup>28</sup> Bureau of Labor Statistics. See <http://stats.bls.gov/news.release/laus.t03.htm> .

**B. The Unique Advantages of dPi's Service Offerings.**

dPi will offer a unique, easy to use, competitive and highly affordable telecommunications service, which it will make available to qualified consumers who have no other service alternatives.

dPi will provide universal service as an ETC throughout its Service Area.

dPi is willing to accept carrier of last resort obligations throughout the universal service areas in which dPi is designated as an ETC by the Commission.

dPi offers a local usage plan comparable to the ones offered by the ILECs in the Service Area.

**C. Impact on the Universal Service Fund.**

ETC designation of dPi will impose a negligible burden on the USF. dPi reiterates that it is applying for ETC designation solely for the purpose of providing Lifeline and Link-Up discounts to qualified low-income consumers and to seek reimbursement for the same and will not seek or accept High Cost support.

Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, is distributed on a per-customer basis, and is directly reflected in the price that the eligible customer pays, it is assured that all support received by the carrier is used to provide Lifeline services to consumers, thus promoting Lifeline and the availability of telephone service to low-income users, which is clearly in the public interest. The FCC reaffirmed this position when it stated that "the potential growth of the fund associated with

high-cost support distributed to competitive ETCs” is not relevant to carriers seeking support associated with the low-income program.<sup>29</sup>

The FCC also recognized that the total effect of additional low-income-only ETC designations would have a minimal impact on the fund when it stated that “any increase in the size of the fund would be minimal and would be outweighed by the benefit of increasing eligible participation in the Lifeline and Link-Up programs, furthering the statutory goal of providing access to low-income consumers.”<sup>30</sup>

It is also vital to recognize that in the case of Lifeline and Link-Up support, an ETC receives USF support *only* for the customers it obtains. In the scenario where a competitive ETC obtains a Lifeline customer from another ETC, only the “capturing” ETC provides Lifeline discounts and as a result, only the “capturing” ETC receives support reimbursement.

In addition, all providers are required to contribute a portion of the interstate revenues received from their customers to the USF. In accordance with current federal regulations, dPi will make contributions based on that portion of its revenue that is determined to be interstate. As such, approving dPi as an ETC will actually create contributions to the USF that were previously non-existent.

**D. Designation of dPi as an ETC Will Benefit Low Income Consumers in the Commonwealth of Pennsylvania.**

Designation of the Company as an ETC will make Lifeline and Link-Up discounts available to many more Pennsylvania residents. This provision of Lifeline and Link-Up discounts is particularly valuable to low-income customers, where, to dPi’s knowledge, there are

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<sup>29</sup> *Petition of TracFone Wireless, Inc. for Forbearance from 47 U.S.C. § 214(e)(1)(A) and 47 C.F.R. § 54.201(i)*, CC Docket No. 96-45, Order, 20 FCC Rcd 15095 (2005) (TracFone Forbearance Order) at ¶ 17.

<sup>30</sup> TracFone Forbearance Order, at ¶ 17.

a limited number of providers offering USF supported service and even fewer offering the same with absolutely no monthly recurring charge to the end-user. As such, the service for which dPi seeks ETC status is unique.

Inclusion of dPi in the Lifeline and Link-up programs will serve the public interest by increasing participation of qualified consumers in those programs, thereby contributing to an overall increase in the number of Pennsylvania residents receiving Lifeline and Link-Up service and an increase to the amount of federal USF dollars benefiting Pennsylvania residents.

Finally, inclusion of dPi in the Lifeline and Link-Up programs will serve the public interest by furthering the extensive role that dPi believes it will play in the provision of communications service to low-income consumers and other consumers who, due to the restrictive credit criteria, deposit requirements, and long-term commitments of traditional service providers, are off network and, without any viable alternative, are likely to remain so.

**V. DPI SATISFIES OR WILL SATISFY THE COMMONWEALTH-SPECIFIC MINIMUM REQUIREMENTS FOR DESIGNATION AS AN ETC IN THE COMMONWEALTH OF PENNSYLVANIA.**

In addition to satisfying the federal standards for ETC designation, dPi agrees to satisfy the Pennsylvania-specific minimum standards as a condition of the Commission's grant of ETC designation to dPi. Said standards include provisions of law, at Section 3019(f) of the Pennsylvania Public Utility Code (66 Pa.C.S. § 3019(f)), the Commission's implementing rules, at 52 Pa. Code § 69.2501, and orders of the Commission establishing Lifeline and Link-up eligibility criteria, as well as procedures for certification and verification of a consumer's initial

and continuing eligibility.<sup>31</sup> The Commission has also established reporting requirements for annual changes in an ETC's Lifeline and Link-up enrollment.<sup>32</sup>

## **VI. SECTION 3019(F) REQUIREMENTS**

Section 3019(f) of the Pennsylvania Public Utility Code (66 Pa.C.S. § 3019(f)) sets forth the minimum requirements for ETCs which seek low income support from Lifeline and Link-up universal support programs. Section 3019(f) includes the following requirements:

- (i) All ETCs certificated to provide local exchange telecommunications service shall provide Lifeline service to all eligible telecommunications customers who subscribe to such service.
- (ii) All eligible telecommunications customers who subscribe to Lifeline service shall be permitted to subscribe to any number of other ETC telecommunications services at the tariffed rates for such services.
- (iii) Whenever a prospective customer seeks to subscribe to local exchange telecommunications service from an ETC, the carrier shall explicitly advise the customer of the availability of lifeline service and shall make reasonable efforts where appropriate to determine whether the customer qualifies for such service and, if so, whether the customer wishes to subscribe to the service
- (iv) ETCs shall inform existing customers of the availability of Lifeline services twice annually by bill insert or message. The notice shall be conspicuous and shall provide appropriate eligibility, benefits and contact information for customers who wish to learn of the Lifeline service subscription requirements.
- (v) ETCs shall provide the department of public welfare with Lifeline service descriptions and subscription forms, contact telephone numbers, and a listing of the geographic area or areas they serve, for use by the department of public welfare in providing the notifications required by this paragraph.
- (vi) No ETC shall be required to provide after the effective date of this section any new Lifeline service discount that is not fully subsidized by the federal universal service fund.

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<sup>31</sup> *In Re: Lifeline and Link-up Programs*, Docket No. M-0051871, (May 23, 2005), as amended by Amended Order entered January 29, 2008 ("Lifeline and Link-up Order").

<sup>32</sup> *See Section 3015(f) Review Regarding Lifeline Tracking Report, Accident report, and Services Outage Report*, 100 Pa. P.U.C. 553 (Dec. 30, 2005) ("Tracking Report Order").

dPi will comply with each of the requirements in Section 3019(f). dPi will provide its prepaid Lifeline service to all eligible telecommunications customers who wish to subscribe to such service and who reside within the Service Area. dPi will also agree to permit eligible customers to subscribe to any number of its other telecommunications services at the standard rates for such services. dPi will establish protocols so that, whenever a prospective customer in the Commonwealth seeks to subscribe to dPi's service, dPi will explicitly advise the customer of the availability of Lifeline service and shall make reasonable efforts to determine whether the customer qualifies for such service and, if so, whether the customer wishes to subscribe to the service. dPi will inform existing customers of the availability of Lifeline service twice annually by postal or electronic mail, or other reasonable means of communication, in compliance with section 3019(f)(4). dPi will provide the Commonwealth's Department of Public Welfare ("DPW") and the Commission's Bureau of Consumer Services ("BCS") with its Lifeline service descriptions and subscription forms, contact telephone numbers and a listing of the geographic area or areas it serves for use by the DPW in providing the notification under section 3019(f)(5).

**B. Certification, Reporting and Complaint Handling Procedures**

dPi commits to: (1) abiding by the applicable requirements set forth in the Lifeline and Link Up Order; (2) abiding by the applicable requirements set forth in the Tracking Order Report; and 3) having consumer Lifeline related complaints, which are unresolved by dPi's customer service staff, be handled by the BCS. As an authorized CLEC, dPi is subject to the dispute resolution and consumer complaint-handling provisions of the Commission's rules and regulations applicable to residential local exchange services, which will be fully applicable to dPi's Lifeline services.

The Lifeline and Link Up Order contains mandated procedures for certification and verification of a customer's initial and continued eligibility for Lifeline services, including obligations that an ETC must attempt to certify a customer's program-based eligibility by referencing DPW's database, or other means such as written documentation of eligibility and participation in one of the eligible programs. In addition, the ETC must verify the continued eligibility of a statistically valid sample of its customers by first cross checking DPW's database of eligible customers. The Lifeline and Link Up Order, at p. 10, states:

[T]he companies ought to use the DPW's database first to establish if there is acceptable social assistance program participation. If the household qualifies, then no further investigation or verification need be done. The household qualifies based on program participation or income verification. If the household does not appear to be enrolled in one of the approved social assistance programs, then 135% FPG [Federal Poverty Income Guidelines] income or less may be verified through either copies of written state or federal income tax returns for the prior year, or the carrier may contact [the Pennsylvania Department of Revenue (DOR)] . . . and pay the nominal fee to have the customer's household's income verified. We agree . . . that self-certification without some form of reasonable independent verification is suspect for fraudulent abuse and will not be acceptable in Pennsylvania as a means for qualifying for our Lifeline . . . programs.

As the Commission has indicated, an ETC must independently certify an applicant's eligibility for Lifeline service through a variety of ways. Such certification may be accomplished through DPW in those instances where the applicant seeks support based on participation in a qualified low income program that is administered by DPW. Independent certification of an applicant's income eligibility is accomplished by an ETC through examination of an applicant's submitted tax returns or other acceptable documentation of income<sup>33</sup> or through

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<sup>33</sup> Acceptable forms of documentation of income include but are not limited to: most recent federal tax returns; most recent state tax returns; most recent W-2 Form; Property tax/Rent Rebate Form; Social Security Benefit Form or 1099 Form; Support Order; 3 months current pay stubs.

the DOR in those instances where the applicant seeks support based solely on income without supporting documentation.

The Commission also requires recertification of Lifeline customers at least annually and in accordance with the FCC procedures established at 47 C.F.R. § 54.410.<sup>34</sup> dPi plans at this time to meet the above-stated Lifeline certification, verification, and annual recertification through deployment of internal resources rather than reliance on a contracted, outside services provider. Should its plans change at any time in this regard, dPi will notify the Commission of same and the particulars thereof.

Pursuant to the Tracking Order, dPi will provide to the BCS a copy of its annual Lifeline Verification Survey results that it files with the Universal Service Administrative Company (“USAC”) by August 31 of each year, as well as the FCC Form 497, Lifeline and Link Up Worksheet (detailing USF support per subscribers), filed with USAC quarterly the third Monday of April, July, October and January.

Finally, dPi agrees to work with the BCS to resolve informal complaints. As provided in its CLEC Tariff, customers may file formal complaints with the Commission if disputes with dPi cannot be resolved informally.

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<sup>34</sup> Lifeline and Linkup Order, at p. 27.

## CONCLUSION

Having demonstrated that dPi satisfies the conditions necessary for designation as an ETC in the Commonwealth of Pennsylvania, and having shown that the public and universal service interests of the telecommunications consumers of the Commonwealth will be properly served, dPi respectfully requests that the Commission

(1) designate dPi as an ETC for the provision of low income support in the Commonwealth of Pennsylvania;

(2) grant approval to issue and make effective on one days' notice dPi's Lifeline and Link-Up tariff sheets set forth in Exhibit A; and

(3) grant such further relief as the Commission deems reasonable and just.

Respectfully submitted,

**DPI TELECONNECT, LLC**



By: \_\_\_\_\_

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## **EXHIBITS**

- Exhibit A - Proposed Lifeline and Link Up Tariff Sheets
- Exhibit B - Authority to Transact Business
- Exhibit C - Pending CLEC Tariff (Selected Sheets)

**VERIFICATION**

I, Charles L. Schneider Jr., first being duly sworn, hereby state that I am the President and CEO of dPi Teleconnect LLC (the "Company") and that I am authorized to make this verification on behalf of the Company.

I hereby state that the facts regarding the Company that are set forth in the foregoing Petition of dPi Teleconnect, LLC for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Pennsylvania for the Limited Purpose of Offering Lifeline and Link-Up Services to Qualified Households are true and correct (or are true and correct to the best of my knowledge, information and belief) and that I expect to be able to prove the same at a hearing held in this matter. I understand that the statements herein are made subject to the penalties of 18 Pa.C.S. § 4904 (relating to unsworn falsification to authorities).

Applicant: dPi Teleconnect, LLC

By: \_\_\_\_\_

Printed: Charles L. Schneider, Jr.

Its: President & CEO

Dated: \_\_\_\_\_

1/12/2012

**EXHIBIT A**

PROPOSED LIFELINE AND LINK UP TARIFF SHEETS

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**COMPETITIVE LOCAL EXCHANGE CARRIER**

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**SECTION 7 – RATES AND CHARGES, (CONT'D.)****7.3 Lifeline Program****7.3.1 Description**

Lifeline Service is a Residence offering for low-income customers who qualify for this service in accordance with the following Regulations. Customers who qualify for Lifeline Service may also qualify for Link Up America Service.

**7.3.2 Regulations**

- A. Lifeline Service is available to qualified residence customers and is provided via a residence individual Dial Tone Line. Lifeline Service is limited to only one Service per qualified customer or household. A potential Lifeline customer who has an outstanding final bill for telephone service which is less than (4) years old must pay the entire balance of any Basic Service final bill before being eligible for Lifeline Service.
- B.. Residence Lifeline Service consists of the following tariffed standard features and optional customer elected services at the applicable rates, charges and regulations for each feature and service provided:
1. One-Party Residence Unlimited Service and Local Measured Service, if available.
  2. Directory Listing (standard only).
  3. Non-Published or Non-Listed Telephone Number Service.
  4. Access to Directory Assistance Service.
  5. Touch Tone Calling Service.
  6. Access to Message Toll Telephone Service and Optional Dial Station-To-Station Calling Plan Services. However, the Residence Lifeline Dial Tone Line will be blocked from dial station access to 976/556/900 and any other type of Audiotex Service.
  7. Access to Operator Services.
  8. Voluntary Toll Restriction Option.
  9. Link Up America (if eligible).
  10. Access to 8XX Services.
  11. Access to Call Trace.
  12. Access to Alerting and Reporting Systems (9-1-1 dialing).
  13. Access to the Pennsylvania Telecommunications Relay Service.
  14. Caller ID Per-call and Per-line Blocking
  15. Other telecommunications services at tariffed rates

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 7 – RATES AND CHARGES, (CONT'D.)

7.3 Lifeline Program, (Cont'd.)

7.3.2 Regulations, (Cont'd.)

- C. An applicant for Lifeline Service must be a current participant in one of the following Pennsylvania Department of Public Welfare (DPW) programs or federal public housing; or be able to provide proof of income which is at or below 135% of the annual United States Census Bureau Poverty Level Guidelines For All States (Except Alaska and Hawaii) and the District of Columbia. Recertification of Lifeline Service participants may be conducted biennially by the Company.

Pennsylvania Department of Public Welfare Lifeline Service Programs:

- \* Temporary Assistance for Needy Families (TANF)
- \* General Assistance (GA)
- \* Supplemental Security Income (SSI)
- \* Medicaid
- \* Food Stamps
- \* Low Income Home Energy Assistance Program (LIHEAP)

Additional Eligible Programs (Federal)

- \* Federal Public Housing
- \* National School Free Lunch Program

The DPW Programs listed above must be certified by DPW. Such certification by DPW will be provided only when a DPW client requests Lifeline Service based on the client's status as a participant in any of the above eligibility programs. Certification by DPW will be limited to confirmation of the client's program status (i.e., participation or non-participation). Participation by DPW is subject to execution of an agreement with DPW and the Company.

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**COMPETITIVE LOCAL EXCHANGE CARRIER**

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**SECTION 7 – RATES AND CHARGES, (CONT'D.)****7.3 Lifeline Program, (Cont'd.)****7.3.2 Regulations, (Cont'd.)**

- D. Lifeline Service will be provided to a customer only so long as such customer continues to meet the participation and certification guidelines in 2 (c) above. At the time of initial establishment of Lifeline Service, the customer agrees to have his or her eligibility recertified as determined by the Company. When the Company is notified by the customer or determines through recertification that the Lifeline Service customer is no longer a participant in the DPW programs in 2 (c) above or otherwise low-income eligible, the customer will be notified (by telephone or letter) that the Lifeline Service rate is no longer applicable. Within the stated customer notification period (10 working days from the date of the notification), the customer can contact the Company to negotiate new Dial Tone Service arrangements at applicable tariff rates (no connection charges will apply for existing services or options retained). If the customer does not contact the Company by the end of the notification period, the Lifeline Service will be changed to applicable Exchange Area Dial Tone Line service at existing tariff rates (no connection charges will apply to existing services or options retained). Upon contacting the Company, the customer will have ten (10) working days to complete the low-income certification or recertification process in order to retain Lifeline Service.
- E. A Lifeline Service customer may not subscribe to any other type of residence Local Exchange Service at the same or other premises. Lifeline Service will not be provided via Foreign Exchange or Foreign Central Office Service arrangements.
- F. Only services listed in 2 (b) above will be provided to Lifeline customers.
- G. Lifeline Service customers are required to apply for the Link Up America benefit when applicable.
- H. Customer requested temporary suspension of Lifeline Service is not permitted.
- I. Lifeline Service does not apply to applicants who are full time students living in university or college controlled housing.

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 7 – RATES AND CHARGES, (CONT'D.)

7.3 Lifeline Program, (Cont'd.)

7.3.2 Regulations, (Cont'd.)

- J. The applicant must not be a dependent for Federal Income Tax purposes, unless he or she is 60 years of age or older.
- K. Lifeline customers are subject to all Residence service regulations in this and other tariffs of [Name] Telephone Company.
- L. Residence Lifeline Service cannot be resold by the Lifeline customer or the Lifeline customer's agent(s).
- M. Resale of Lifeline Services are subject to wholesale rate obligations under Section 251(c) (4) of the Telecommunications Act of 1996.
- N. All outstanding charges, account balances and service restrictions apply to existing customers who qualify for Lifeline Service. Service restrictions will remain until the arrearage(s) have been paid in full.
- O. Any Lifeline customer who has a past due balance of Toll Charges will be treated with the appropriate Chapter 64 regulations. The Residence Toll Restoral Charge applies to Lifeline Customers who are suspended for non-payment and who subsequently pay their outstanding toll charges and request toll restoral. If a Lifeline customer is toll restricted for a second occurrence the Company may, at its discretion, place the Lifeline customer on permanent toll restriction.
- P. Toll-Blocking and Toll-Control services will be provided at no charge to Lifeline Service subscribers, to the extent that they are offered.

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 7 – RATES AND CHARGES, (CONT'D.)

7.3 Lifeline Program, (Cont'd.)

7.3.3 Dial Tone Line Monthly Rate

- A. Applicable Residence Dial Tone monthly rate minus \$1.75 (1).
- B. Lifeline Service customers will be billed the applicable Subscriber Line Charge monthly rate and will be given credit for the same amount of the Subscriber Line Charge as prescribed by the Federal Communications Commission Docket Nos. 00-256, 96-45, 98-77, 98-166 and 00-193.
- C. Lifeline Service is subject to all applicable state, local and federal taxes, and surcharges, and to all applicable tariff rates, charges, surcharges and regulations.

NOTE: (1) The Dial Tone Line and Subscriber Line Charge monthly rate discounts will be reduced to the extent that application of the full discount would not result in rates that are less than zero.

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 7 – RATES AND CHARGES, (CONT'D.)

7.4 Link Up America

7.4.1 Description

Link Up is a program designed to promote universal service by providing a discount on service connection charges for qualified low-income customers.

NOTE: Customers who qualify for Link Up America Service may also qualify for Lifeline Service.

7.4.2. Regulations

Link Up America is available to residence customers who meet the following eligibility criteria:

- A. The applicant must not be a dependent for federal income tax purposes, unless he or she is 60 years of age or older. The applicant must self-certify this requirement.
- B. An applicant for Link Up America Service must be a current participant in one of the following Pennsylvania Department of Public Welfare (DPW) programs or federal public housing; or be able to provide proof of income which is at or below 135% of the annual United States Census Bureau Poverty Level Guidelines For All States (Except Alaska and Hawaii) and the District of Columbia. Recertification of Lifeline Service participants may be conducted biennially by the Company.

Pennsylvania Department of Public Welfare Link Up America Service Programs:

- Temporary Assistance for Needy Families (TANF)
- General Assistance (GA)
- Supplemental Security Income (SSI)
- Medicaid
- Food Stamps
- Low Income Home Energy Assistance Program (LIHEAP)

Additional Eligible Programs (Federal)

- Federal Public Housing
- National School Free Lunch Program

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**COMPETITIVE LOCAL EXCHANGE CARRIER**

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**SECTION 7 – RATES AND CHARGES, (CONT'D.)**

## 7.4 Link Up, (Cont'd.)

## 7.4.2. Regulations, (Cont'd.)

## B. (Cont'd.)

The DPW Programs listed above must be certified by DPW. Such certification by DPW will be provided only when a DPW client requests Link Up America Service based on the client's status as a participant in any of the above eligibility programs. Certification by DPW will be limited to confirmation of the client's program status (i.e., participation or non-participation). Participation by DPW is subject to execution of an agreement with DPW and the Company.

- C. The Link Up America discount is applicable to one access line (dial tone line) when applied to the installation or relocation of main service at a customer's principal residence.
- D. Link Up America applicants are not exempt from Company deposit requirements,
- E. Service will not be established at discounted rates prior to receipt of certification. Service will be established at full service connection charges. If certification is received within 60 days of original application, credit will be applied to provide the Link Up America discount.
- F. The Link Up America discount does not apply to applicants who are full-time students living in university or college controlled housing.

## 7.4.3. Rates

The Link Up America Program provides for a 50% discount on the Service Connection Charge associated with the connection of a new residence exchange access line (dial tone line) as specified in the Company's tariffs. The total amount of the discount may not exceed \$30.00 and the remaining charges will be billed to the Link Up America customer in monthly installments as specified in the Company's tariffs.

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**EXHIBIT B**

AUTHORITY TO TRANSACT BUSINESS



## Corporations

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## Business Entity Filing History

**Date:** 12/19/2011

(Select the link above to view the Business Entity's Filing History)

### Business Name History

Name	Name Type
DPI TELECONNECT, L.L.C.	Current Name

### Limited Liability Company - Foreign - Information

<b>Entity Number:</b>	2856585
<b>Status:</b>	Active
<b>Entity Creation Date:</b>	1/20/1999
<b>State of Business.:</b>	DE
<b>Registered Office Address:</b>	% Corporation Service Company PA Dauphin
<b>Mailing Address:</b>	No Address



**EXHIBIT C**

PENDING CLEC TARIFF (SELECTED SHEETS)

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**COMPETITIVE LOCAL EXCHANGE CARRIER**

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**SECTION 5 –NETWORK SERVICE OFFERINGS****5.1 Types of Services Offered**

This Section of the tariff contains a general description of the services offered by the Company and the rates applicable to each service. dPi Teleconnect, LLC provides single, touch tone, voice-grade services that enable Users to communicate on a real-time basis between points within local calling areas in the Commonwealth of Pennsylvania.

**5.1.1 Basic Local Exchange Service**

A. Basic Local Exchange Service provides a Customer with a telephonic connection and a unique telephone number, which enables the Customer to:

1. receive calls from other stations on the public switched telephone network;
2. access the Company's Local Calling Services and other Services as set forth in this tariff;
3. access interexchange calling services of the Company and of other carriers (through use of a toll-free platform only);
4. access (at no additional charge) to the Company's operators and business office for service related assistance;
5. access toll-free telecommunications services such as 800 NPA; and access toll-free emergency services by dialing 0 or 9-1-1 (where available); and
6. access relay services for the hearing and/or speech impaired.

B. Individual line residence service is comprised of exchange access lines, which are defined as central office line equipment and all the Company plant facilities up to the demarcation point. These facilities are Company-provided and maintained and provide access to and from the telecommunications network for local calling appropriate to the tariffed use offering selected by the customer.

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Effective: January 20, 2012

Issued by: Charles L. Schneider, Jr., President & CEO  
1330 Capital Parkway, Carrollton, TX, 75006

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 5 –NETWORK SERVICE OFFERINGS, (CONT'D.)

5.1 Types of Services Offered, (Cont'd.)

5.1.2 Residential Basic Line Service - Prepaid

- A. Residential Basic Line Service - Prepaid provides a residential customer with all of the features of basic local exchange service set forth above, provided over a single, voice-grade telephonic communications channel which can be used to place or receive one call at a time. Residential Basic Line Service – Prepaid is available only within the geographic areas set forth in Section 4 of this tariff.
  
- B. The Company's Prepaid service permits a customer to:
  - 1. place calls within the local calling area as defined in Section 5 of this tariff;
  - 2. access 911 service if available in the customer's local calling area, or by dialing "O" where 911 service is not available;
  - 3. place calls to toll-free "800," "888," "877" or other designated prefixes for toll-free service.
  
- C. The Company's Prepaid service does not permit a customer to:
  - 1. originate calls to direct dial (1+) or (0+) toll services;
  - 2. access caller-paid information services (e.g., "900", "976", "711"; or
  - 3. utilize (0-) services.

Calls to telephone numbers used for toll services, caller-paid information services and the ability to receive collect calls will be blocked by the Company when possible.

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 5 –NETWORK SERVICE OFFERINGS, (CONT'D.)

5.1 Types of Services Offered, (Cont'd.)

5.1.2 Residential Basic Line Service - Prepaid, (Cont'd.)

D. The Company provides the following Prepaid Service Packages:

1. dPi Basic Package: The dPi Basic Package entitles the customer to unlimited outgoing calls per month within the local calling area without additional charge beyond the monthly rate per access line. Usage under any optional plans cannot be aggregated with this plan.
2. dPi Advantage Package: The dPi Advantage Package entitles the customer to unlimited outgoing calls per month within the local calling area without additional charge beyond the monthly rate per access line. Usage under any optional plans cannot be aggregated with this plan. The dPi Advantage Package also includes:
  - a. Call Waiting, and
  - b. Caller ID.
3. dPi Premier Package: The monthly rate for the dPi Premier Package entitles the customer to unlimited outgoing calls per month within the local calling area without additional charge beyond the monthly rate per access line. Usage under any optional plans cannot be aggregated with this plan. The dPi Premier Package also includes:
  - a. Call Waiting,
  - b. Caller ID,
  - c. Call Return,
  - d. Call Forwarding, and
  - e. 3-Way Calling.

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COMPETITIVE LOCAL EXCHANGE CARRIER

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SECTION 7 – RATES AND CHARGES

7.1 Basic Local Exchange Service

Service provided as defined in Section 5.1 of this tariff. Service charges under Section 7.2 also apply.

7.1.1 Residential Basic Line Service – Prepaid

A. dPi Basic Package:

This is an unregulated service, the prices for which are not regulated by the Pennsylvania Commission

Monthly Rate:

In Verizon Pennsylvania Inc. Service Areas:	\$39.99
In Verizon North LLC Service Areas:	\$39.99
In CenturyLink Service Areas	\$29.99

B. dPi Advantage Package:

This is an unregulated service, the prices for which are not regulated by the Pennsylvania Commission

Monthly Rate:

In Verizon Pennsylvania Inc. Service Areas:	\$46.99
In Verizon North LLC Service Areas:	\$46.99
In CenturyLink Service Areas	\$46.99

C. dPi Premier Package

This is an unregulated service, the prices for which are not regulated by the Pennsylvania Commission

Monthly Rate:

In Verizon Pennsylvania Inc. Service Areas:	\$56.99
In Verizon North LLC Service Areas:	\$56.99
In CenturyLink Service Areas	\$66.99

D. DA Calls: \$1.50 per call

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