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June 26, 2009

Luly E. Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

Re: Docket No. 4049 – BLC Management, LLC d/b/a Angles Communications Solutions

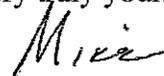
Dear Luly:

This office represents BLC Management, LLC d/b/a Angles Communications Solutions (BLC).

On behalf of BLC, enclosed please find an original and nine copies of BLC's responses to Verizon's first set of data requests in the above-referenced proceeding.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Michael R. McElroy

cc: Service List

Question 1: Please provide all documents concerning BLC's business plan or mission statement or describing the nature of BLC's business.

Response: Not available at this time.

Question 2: Does BLC intend to serve any Rhode Island customers other than residential Lifeline customers?

Response: The company will market to credit challenged and low income customers, most of whom will be eligible for Lifeline and Linkup service.

Question 3: How long has BLC been providing local exchange service in any jurisdiction in the United States? Please describe in detail BLC's history and experience as a local exchange provider.

Response: BLC has been providing local exchange service since 2004. The company is currently providing service in Alabama, Florida, Kentucky, Louisiana, Mississippi, North Carolina, Tennessee, and has approximately 80,000 customers. BLC has a 200 person call center to perform the tasks of provisioning, customer service and repair.

Question 4: Does BLC own any facilities in Rhode Island? If so, please identify all such facilities and their location. Does BLC intend to obtain ownership of any facilities in Rhode Island? If so, please identify those facilities.

Response: No, BLC does not own any facilities in Rhode Island. BLC does not intend to obtain ownership of any facilities in Rhode Island, other than leased network facilities obtained from Verizon.

All Contacts Providing Information/Response for the above questions:

Brian Cox, President
11121 Highway 70, Suite 202, Arlington, Tennessee 38002
E-Mail: brian@prepaidworx.com
Telephone Number: (901) 373-3103

Question 5: Paragraph 1 of the Application states that BLC intends to provide service using a combination of resale and UNEs obtained through interconnection agreements. Has BLC entered into any interconnection agreements with any other carriers regarding service in Rhode Island? If so, please provide the names of each such carrier, the dates of such agreements and the dates any such agreements were filed with the Commission.

Response: BLC has initiated interconnection negotiations with Verizon in Rhode Island.

Question 6: Footnote 9 of the Application refers to “BLC’s use of UNEs...commingled with § 271 elements.” Has BLC entered into any agreement with Verizon to obtain network elements available under § 271 of the Telecommunications Act for the purpose of providing service in Rhode Island? If so, please identify the parties to that agreement and the date of that agreement.

Response: No, See answer to Question 5 above.

Question 7: Paragraph 6(e) of the Application states that, “Through its agreements with Verizon, Applicant currently provides its subscribers access to 911 emergency services, and also provides Enhanced 911 services...” Please identify all such agreements with Verizon, including the title of each such agreement, the names of the parties to the agreement, the date of the agreement and a summary of the substance of each such agreement.

Response: Please see answer to Question 5 above.

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Question 8: Please identify the types of network elements, if any, that BLC plans to lease from Verizon.

Response: BLC intends to offer the supported services either through the purchase of switched port/loop combinations (UNEs) or through resale. These facilities are physical components of the telecommunications network that are used in the transmission or routing of the services for which support is requested. Because these facilities include unbundled network elements, the method by which BLC provisions the supported services is consistent with the FCC's rules found at 47 CFR § 54.201(d)(1) through (i).

Question 9: Does BLC currently provide local exchange or exchange access service in Rhode Island? If so, please describe the nature of the services provided and geographic area in which those services are provided. If BLC does not currently provide service in Rhode Island, please state when BLC expects to begin providing service in the state.

Response: BLC does not currently provide local exchange or exchange access service in Rhode Island. BLC expects to begin providing service in Rhode Island by the end of 2009.

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Question 10: Paragraph 6 of the Application repeatedly uses the present tense in asserting that BLC provides each of the services required of an ETC carrier. Does BLC currently provide any of the services discussed in this paragraph in Rhode Island? For each such service or access to a service, describe in detail how BLC is currently providing that service or, if BLC is not currently providing such service, how it intends to provide such service.

Response: BLC does not currently provide any of the services discussed in this paragraph in Rhode Island.

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Question 11: Paragraph 9 of the Application states that “BLC will serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the Designated Service Area.” Does BLC intend to serve all exchanges in Rhode Island? If so, how does BLC intend to serve exchanges where it does not lease UNEs or resell Verizon’s services?

Response: BLC intends to provide service only in Verizon exchanges.

Question 12: Is it BLC’s position that even though Rhode Island is currently served by at least one ETC, the Commission can designate BLC as an ETC in Rhode Island without determining that doing so is “consistent with the public interest, convenience, and necessity” as provided in Section 214(e)(2) of the Telecommunications Act? If so, please explain the basis for that position and provide all legal authority on which BLC relies in taking that position.

Response: BLC believes it has demonstrated that its designation is consistent with the public interest, convenience and necessity. Since BLC is seeking only low income support, and Lifeline is designed to reduce the monthly cost of telecommunications services for eligible households, and is distributed on a per-household 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.

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Question 13: Does BLC have an approved tariff on file with the Commission? If so, please provide a copy.

Response: Yes, BLC has an approved tariff on file with the Commission, which is available to the public.

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Question 14: Please explain the basis for BLC's assertion in paragraph 15 of the application that an ETC applicant need not submit the five-year plan provided for in 47 CFR 54.202(a)(6)(ii) where its "requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low-income" USF support." Provide in your answer citations to all legal authority BLC relies on in taking this position.

Response: Many states have adopted an exception to the five-year plan for low income only petitions, and many other states have approved ETC applicants without the submission of five-year plans. Since every dollar of low income support is applied on a dollar per dollar basis to low eligible households' phone bills, a five year plan would not be meaningful in the context of low income support, particularly in light of the fact that the company is not seeking high cost support.

Question 15: Please explain in detail how BLC intends to satisfy the carrier of last resort obligations it would bear as an ETC.

Response: It is BLC's interpretation of the FCC rules that it must be "willing" to accept carrier of last report obligations, which it has affirmatively stated, and thus complies with FCC rules. Since BLC will provide services only in Verizon exchanges, this should never be an issue, as BLC will continue to provide service as long as Verizon, or a successor of Verizon, provides service in the Verizon service area.

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Question 16: Please describe in detail BLC's policies, practices and plans for remaining functional in emergency situations and for restoring lost service in such situations. In addition, please explain in detail how BLC "provides to its customers the same ability to remain functional in emergency situations as currently provided by Verizon..." as asserted in paragraph 18 of the Application. With respect to services provided using UNEs, please state whether BLC has established back office systems, customer support capabilities and staff and repair facilities and staff to respond to customer complaints and loss of service, and describe those systems, capabilities, staffing and facilities.

Response: BLC intends to provide service to its customers through resale or the use of switched port/loop combination UNEs, leased from Verizon, which will allow BLC to provide to its customers the same ability to remain functional in emergency situations as currently provided by Verizon to its own customers (including access to a reasonable amount of back-up power to ensure functionality without an external power source, rerouting of traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations). BLC emergency procedures are as follows:

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This procedure identifies what course of action to follow in the event of an emergency situation that affects customers.

During normal customer service normal operating hours (Monday through Friday 8am to 7pm CST, Saturday 8am to 3pm CST) a customer can call toll free 1-877-264-5375 to talk to a customer service representative.

Outside normal customer service normal operating hours a customer can call toll free 1-877-264-5375 to leave a message on an IVR. The customer will receive a return call from a customer service representative the following business day during normal operating hours. Customer service representative will then follow the normal problem correction and escalation procedures.

In the event of an IVR outage the toll free number will be re-routed to a working number following the 'How To: Reroute inbound calls to IVR in the event of an outage' procedure. The company maintains multiple circuits that support the toll free 1-877-264-5375 number reducing the likelihood of a customer not being able to reach the company in an emergency.

The company also maintains an outbound dialing capability that will be loaded with an emergency message. The dialer is set to call the numbers of customers and can be set to continue to dial until the connection is completed.

Question 17: Please identify any jurisdiction in which BLC has applied for ETC status as of the date of its answer to this request, in addition to the jurisdiction referenced in ¶ 21 of the Application.

Response: BLC recently was granted ETC status in Iowa, and has applications pending in Idaho, Massachusetts, Montana, Pennsylvania and Vermont.

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