



State of Rhode Island and Providence Plantations

DEPARTMENT OF ATTORNEY GENERAL

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Patrick C. Lynch, Attorney General

August 12, 2009

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

Re: **BLC MANAGEMENT, LLC– Docket 4049;**
Application for Designation as an Eligible Telecommunication Carrier

Dear Ms. Massaro:

The Division of Public Utilities and Carriers (“Division”) hereby consents to BLC Management, LLC’s (“BLC”) request that its Application for Designation as an Eligible Telecommunications Carrier (“ETC”) be stayed for a period of ninety- (90) days.

During the period of the Stay, the Division requests the following preliminary issues resolved. First, whether BLC has obtained an interconnection agreement with Verizon-RI. Second, should BLC be required to have a minimum number of Rhode Island non-lifeline customers to create a historical record of customer service in support of its application?

Finally, the Division is concerned that based upon information it has reviewed, BLC’s ratepayers will pay almost 373 percent¹ more for its proposed local exchange

¹ VZ-RI Comments bottom page 3 and top page 4. BLC rate \$49.95 less Lifetime Support \$13.50 equals \$ 36.45 ratepayer’s cost. VZ-RI range, net of discount (\$7.30 + \$12.26)=\$19.56/2= \$9.78 average ratepayer’s cost. BLC net rate estimate \$36.45 divided by net rate estimate VZ-RI \$9.78 equals 373% more for BLC ratepayers for Lifeline. The Division is of the opinion that, BLC is using the inflated final net rate to pay Agents signing up to sell Lifeline (Web page promoting income by commissions for selling Lifeline services as a “Great Opportunity”

Luly Massaro, Commission Clerk
Page 2
August 12, 2009

service than Verizon RI's equivalent service and therefore on its face such a rate is not consistent with the public interest, convenience and necessity

Thank you for your attention in this matter and if you should have any questions, please feel free to contact me.

Sincerely,

Thomas Ahern
Administrator
Division of Public Utilities and
Carriers

By his Attorney,

A handwritten signature in black ink, appearing to read "J. Hagopian", with a long horizontal flourish extending to the right.

Jon G. Hagopian
Special Assistant Attorney General

cc: Service List