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April 16, 2008

**VIA OVERNIGHT DELIVERY**

Ms. Colleen Dale  
Chief ALJ and Executive Secretary  
Missouri Public Service Commission  
200 Madison Street, Suite 100  
Jefferson City, MO 65102

**FILED<sup>2</sup>**

APR 17 2008

**Missouri Public  
Service Commission**

Re: dPi Teleconnect, LLC  
Case No. TA-2008-0247

Dear Ms. Dale:

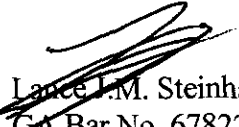
Enclosed please find for filing an original and eight (8) copies of the Amendment to Application for Certification as an Eligible Telecommunications Carrier Within the State of Missouri to be filed in the above-referenced Case.

Please send notification of the filing of this application to lsteinhart@telecomcounsel.com. I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage prepaid envelope.

If you have any questions or if I may provide you with any additional information, please do not hesitate to contact me.

Please note that this Amendment to Application is being submitted by myself and Judith A. Rau, Esq., Missouri Counsel, Bar # 24856.

Respectfully submitted,

  
Lance J.M. Steinhart  
GA Bar No. 678222

Attorney for dPi Teleconnect, LLC

Enclosures

cc: David Dorwart  
Michael Dandino, Office of Public Counsel  
General Counsel, Missouri Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

**FILED<sup>2</sup>**

APR 17 2008

IN THE MATTER OF THE APPLICATION OF )  
DPI TELECONNECT, LLC )  
FOR CERTIFICATION AS AN ELIGIBLE )  
TELECOMMUNICATIONS CARRIER )

Missouri Public  
Service Commission  
CASE NO. TA-2008-0247

AMENDMENT TO  
APPLICATION FOR CERTIFICATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER

On January 28, 2008, dPi Teleconnect, LLC ("dPi" or the Applicant") filed an application in the above-referenced Case with the Missouri Public Service Commission (the "Commission") seeking designation as an eligible telecommunications carrier for the purpose of receiving federal universal service support under Section 214 of the Telecommunications Act of 1996 and the implementing regulations of the Federal Communications Commission (the "Application").

The Commission issued an Order effective on March 6, 2008, directing Staff to file a recommendation regarding the Application no later than April 3, 2008.

The Commission's Staff reviewed the Application and filed its recommendation regarding the Application on April 3

The Commission issued an Order effective on April 4, 2008, that dPi Teleconnect, LLC, shall file an amended application, or otherwise respond to the recommendation filed by Staff, by April 17, 2008.

Based upon the foregoing, and specifically the April 4, 2008 Commission Order, dPi hereby files this Amendment to Application for Certification as an Eligible Telecommunications Carrier, to replace in its entirety, the original Application filed in this Case on January 26, 2008.

dPi Teleconnect, LLC ("dPi" or the "Applicant"), pursuant to Section 214(e)(2) of the Communications Act of 1934, as amended (the "Act")<sup>1</sup> and Sections 54.101 through 54.207 of the Rules of the Federal Communications Commission ("FCC"),<sup>2</sup> and the rules and regulations of the Missouri Public Service Commission, including 4 CSR 240-3.570, hereby applies to the Commission for certification as an Eligible Telecommunications Carrier ("ETC") throughout the Southwestern Bell Telephone Company, L.P. d/b/a AT&T Missouri service territories, as set forth in the list of exchanges attached hereto as Exhibit I (the "Designated Service Area") for the purpose of receiving federal universal service support. The Applicant is seeking only low income support, and is not requesting high cost support. As demonstrated below, dPi satisfies all of the statutory and regulatory requirements for designation as an ETC in the Designated Service Area. Furthermore, designation of dPi as an ETC in the Designated Service Area will serve the public interest. Accordingly, dPi respectfully requests that the Commission grant this Application.

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<sup>1</sup> 47 U.S.C. § 214(e)(2).

<sup>2</sup> 47 C.F.R. §§ 54.101-54.207.

The name and address of Applicant's in-state attorney is:

Judith A. Rau, Esq.  
Rau & Rau  
119 E. Mill Street  
Waterloo, Illinois 62298

All correspondence, communications, pleadings, notices, orders and decisions relating to this Application should also be addressed to:

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## **I. Background**

1. dPi is a Delaware limited liability company<sup>3</sup> and is authorized to conduct business as a foreign limited liability company in the State of Missouri. Copies of the Applicant's Articles of Organization and authority to transact business in the State of Missouri are on file with the Commission and incorporated herein by reference. The Applicant was granted a Certificate to Provide Basic Local and Exchange Access Telecommunications Service in the State of Missouri in Case No. TA-2000-44 by Order effective November 29, 1999. The principal office of the Applicant is located at 2997 LBJ Freeway, Suite 225, Dallas, TX 75234. The telephone number of the Applicant is 972-488-5500. The Applicant provides local exchange and exchange access services in the Designated Service Area using a combination of resale and unbundled network elements, or unbundled network equivalents obtained through commercial agreements ("UNEs") that allows end-to-end switching delivery of calls.
2. As set forth in Section 214(e)(2) of the Act, the Commission "shall upon its own motion or upon request designate a common carrier that meets the requirements of [Section 214(e)(1)] as an eligible telecommunications carrier for a service area designated by the State commission."<sup>4</sup> Upon designation as an ETC, the carrier

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<sup>3</sup> dPi was organized in the State of Delaware on January 15, 1999

<sup>4</sup> 47 U.S.C. § 214(e)(2); *see* 47 C.F.R. § 54.201(b) (FCC Rules citing the Act's requirements).

shall be eligible to receive universal support in accordance with Section 254 of the Act.<sup>5</sup>

3. The requirements for designation as an ETC set forth in Section 214(e)(1) are that the carrier must:

- a) offer the services that are supported by Federal universal support mechanisms under section 254(c), 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 the media of general distribution.<sup>6</sup>

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<sup>5</sup> 47 U.S.C. § 214(e)(1).

<sup>6</sup> *Id.*

## **II. dPi Satisfies the Requirements for Designation as an ETC to Serve the Designated Service Area**

1. dPi is a common carrier as that term is defined in the Act.<sup>7</sup> The Applicant provides competitive local telecommunications services in the Designated Service Area pursuant to Case No. TA-2000-44 referenced above.
2. dPi offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs, or the equivalents thereof, through commercial agreements. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's services.<sup>8</sup> Accordingly, the Applicant satisfies the requirement set forth in Section 214(e)(1)(A).
3. The services that are supported by Federal universal support mechanisms under section 254(c) are enumerated in the rules of the Federal Communications Commission ("FCC") at 47 C.F.R. § 54.101(a)(1)-(9); and 4CSR 240-3.570(3)(C). These services are:

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<sup>7</sup> See 47 U.S.C. § 153(10) ("the term 'common carrier' or 'carrier' means any person engaged as a common carrier for hire, in interstate or foreign communication by wire or radio or in interstate or foreign radio transmission of energy . . .").

<sup>8</sup> Section 54.201(f) of the FCC's Rules states, "[f]or the purposes of this section, the term 'own facilities' includes, but is not limited to, facilities obtained as unbundled network elements pursuant to Part 51 of this chapter, provided that such facilities meet the definition of the term 'facilities' under this subpart." 47 C.F.R. § 54.201(f). The term "facilities" under Section 54.201 is defined as "any physical components of the telecommunications network that are used in the transmission or routing of the services that are designated for support pursuant to subpart B of this part." 47 C.F.R. § 54.201(e). dPi's use of UNEs, or equivalents thereof, meets this definition of "facilities."

- a) Voice grade access to the public switched network. "Voice grade access" is defined as a functionality that enables a user of telecommunications services to transmit voice communications, including signaling the network that the caller wishes to place a call, and to receive voice communications, including receiving a signal indicating there is an incoming call. For the purposes of this part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz;
- b) Local usage. "Local usage" means an amount of minutes of use of exchange service, prescribed by the FCC, provided free of charge to end users;
- c) Dual tone multi-frequency signaling or its functional equivalent. "Dual tone multi-frequency" (DTMF) is a method of signaling that facilitates the transportation of signaling through the network, shortening call set-up time;
- d) Single-party service or its functional equivalent. "Single-party service" is telecommunications service that permits users to have exclusive use of a wireline subscriber loop or access line for each call placed, or, in the case of wireless telecommunications carriers, which use spectrum shared among users to provide service, a dedicated message path for the length of a user's particular transmission;



- e) Access to emergency services and Emergency telephone number services capable of automatic number identification, automatic location identification, and call routing facilities to public safety response. "Access to emergency services" includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations. 911 is defined as a service that permits a telecommunications user, by dialing the three-digit code "911," to call emergency services through a Public Service Access Point (PSAP) operated by the local government. "Enhanced 911" is defined as 911 service that includes the ability to provide automatic numbering information (ANI), which enables the PSAP to call back if the call is disconnected, and automatic location information (ALI), which permits emergency service providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems;
- f) Access to operator services. "Access to operator services" is defined as access to any automatic or live assistance to a consumer to arrange for billing or completion, or both, of a telephone call;
- g) Access to interexchange service. "Access to interexchange service" is defined as the use of the loop, as well as that portion of

the switch that is paid for by the end user, or the functional equivalent of these network elements in the case of a wireless carrier, necessary to access an interexchange carrier's network;

- h) Access to directory assistance. "Access to directory assistance" is defined as access to a service that includes, but is not limited to, making available to customers, upon request, information contained in directory listings;
  - i) Toll limitation and/or blocking for qualifying low-income consumers; and
  - j) Access to telecommunications relay services by dialing 711.
- 4. Pursuant to 4 CSR 240-3.570(3)(A), the Applicant shall develop a bill design that can be easily interpreted by its customers and clearly sets forth charges in compliance with state and federal billing requirements.
  - 5. Pursuant to 4 CSR 240-3.570(3)(B), the Applicant shall provide customer service contact information online and on billing statements. Applicant acknowledges that this requirement also applies to ETCs that use a third party billing agent.

6. Pursuant to 4 CSR 240-3.570(3)(E), the Applicant shall maintain a record of customer complaints that have been received by the company in a manner that includes, at a minimum: the end-user name; the account number; a description of the complaint; the date the complaint was filed; the resolution; and the amount of refund or credit, if any. Applicant shall also maintain record of complaints from consumers in the Missouri service area in which ETC designation was granted that have been submitted to or filed with the Federal Communications Commission for which the company has knowledge in a manner that includes, at a minimum: a description of the complaint; the date the complaint was filed; the date the complaint was resolved; the resolution of the complaint and the amount of refund or credit, if any.
7. Pursuant to 4 CSR 240-3.570(3)(F), the Applicant shall , within ten (10) days of a change in the company-designated contacts, either notify the manager of the Telecommunications Department, in writing or by electronic mail, or shall update the commission's electronic filing system (EFIS). The notification or update shall include the name(s), address(es) and/or telephone number(s) of the designated individual(s). The contact name(s) provided pursuant to this section shall be the individual(s) primarily responsible for: customer service; repair and maintenance; answering complaints; authorizing and/or furnishing refunds to customer; and informational or tariff filing issues.

8. Upon certification as an ETC, dPi will participate in, and offer, LifeLine and Link-Up discounts to qualifying low-income consumers and publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services, as required by FCC Rules<sup>9</sup> and pursuant to 4 CSR 240-3.570(2)7.
9. dPi will advertise the availability of services and charges for those services using media of general distribution throughout the Designated Service Area, as required by FCC Rules<sup>10</sup> and pursuant to 4 CSR 240.3.570(2)6.

### **III. Area for Which ETC Certification Is Requested**

1. dPi has served and will continue to serve the exchanges where it leases UNEs or resells the services of the non-rural telephone companies in the Designated Service Area. dPi does not seek certification as an ETC in any areas served by rural telephone companies.

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<sup>9</sup> See 47 C.F.R. §§ 54.401-54.417; 54.405(b)& 54.411(d)..

<sup>10</sup> See 47 C.F.R. §§ 54..201(d)(2).

#### **IV. Granting dPi's Application Will Be Consistent with the Public Interest, Convenience and Necessity**

1. Congress requires that the Commission grant competitive ETC applications in non-rural areas.<sup>11</sup> No specific public interest test is mentioned, as is the case for areas served by rural telephone companies.<sup>12</sup> Thus, the Act provides that the Commission "shall" designate dPi as an ETC upon finding that the company meets the nine-point list of services and that it agrees to advertise the supported services throughout the Designated Service Area. Notwithstanding, the designation of dPi as an ETC will serve the public interest.
2. A central purpose of the Telecommunications Act of 1996 was to "promote competition and reduce regulation ... [thereby securing] lower prices and higher quality services ... and encourage the rapid deployment of new telecommunications technologies."<sup>13</sup> Designation of dPi as an ETC would further these goals. Granting ETC status to dPi would allow the Company to obtain federal universal service support, which it will use to offer innovative telecommunications services at competitive prices to consumers in the Designated Service Area.

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<sup>11</sup> See 47 U.S.C. 214(e)(2).

<sup>12</sup> See *Id.*

<sup>13</sup> The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 56 (1996).

3. Pursuant to 4 CSR 240-3.570(2)6, dPi will announce and advertise telecommunications services as an ETC where it provides service in its Designated Service Area in Missouri and will publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services. Accordingly, more low-income Missouri 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. dPi advertises its services through several different media of general distribution including (but not limited to) marketing at targeted retail locations, including rent-to-own centers, as well as advertisements via television, radio, newspapers and trade magazines. A copy of a sample sales brochure is attached hereto as Exhibit III. A copy of a sample newspaper advertisement is attached hereto as Exhibit IV.
4. Since Applicant provides service exclusively to credit challenged customers who generally cannot obtain service from the ILEC, AT&T of Missouri, the granting of ETC status is clearly in the public interest, because the services are simply not available to a significant portion of the eligible low income consumers. To Applicant's knowledge, Lifeline and Link-Up services are not being sufficiently advertised and made available to eligible low income consumers in the Designated Service Area. According to the best data available to Applicant, as of December 31, 2006, only between 10% and 20% of consumers eligible for Lifeline and Linkup Services in the State of Missouri were being provided such

services. Please see attached Exhibit II, 2006 Lifeline Participation Rates by State, which was obtained from the Universal Service Administrative Company ("USAC"), an independent not-for-profit corporation designated as the administrator of the federal Universal Service Fund by the Federal Communications Commission (FCC). USAC administers Universal Service Fund (USF) programs for high cost companies serving rural areas, low-income consumers, rural health care providers, and schools and libraries.

5. A grant of dPi's application will serve the public interest by increasing customer choice for eligible low-income customers and the market as a whole by promoting additional deployment of dPi's local exchange service offerings to the areas served by AT&T Missouri. As shown further below, dPi offers quality service at affordable prices. dPi adds another choice of provider for low-income customers in the Designated Service Area. If designated as an ETC, Applicant will offer service to many low-income customers who may not have been able to have service but for the Applicant. In addition, the public interest will be served by assuring quality telecommunications service to low-income customers in the Designated Service Area through the commitments Applicant makes with respect to the ETC Order. An additional part of the FCC's public interest assessment includes a "cream skimming" analysis if the ETC applicant is seeking designation below the study area level of a rural telephone company. Since Applicant does not seek designation below the study area level of a rural telephone company, no "cream skimming" analysis is required.

6. dPi will provide universal service as an ETC in all of its Designated Service Area.
7. Pursuant to 4 CSR 240-3.570(2)9, dPi acknowledges it shall provide equal access pursuant to 4 CSR 240-32.100(3) and (4) if all other ETCs in the Designated Service Area relinquish their designations pursuant to section 214(e) of the Telecommunications Act of 1996. The FCC's ETC Order does not impose a general equal access requirement on ETC applicants at this time, but instead suggests the applicants acknowledge that an ETC applicant may be required to provide equal access to long distance carriers in their designated service area in the event that no other ETC is providing equal access within the service area. Applicant acknowledges this potential and will abide by the requirement should it occur in the future.



8. dPi is aware that it may seek USF funding only with respect to those customers that it serves through the use of its own facilities (including UNE-P or equivalent facilities).
9. Pursuant to 4 CSR 240-3.570(2) (A)1-3, each request for ETC designation shall include: the intended use of the high-cost support; including a two year plan to demonstrate the proper use of high-cost support. Under FCC guidelines, an ETC Applicant must submit a five-year plan that describes with specificity proposed improvements or upgrades to the applicant's network on a wire center-by-wire center basis throughout its proposed Designated Service Area. The only circumstance warranting deviation from this requirement is where an applicant's requested ETC serving territory would qualify it to receive no "high cost" USF support, but only "low income" USF support. Because dPi seeks ETC designation solely for purposes of reimbursement for provision of subsidized Lifeline and Link-Up services to eligible customers, submission of a Five-Year Network Improvement Plan per FCC guidelines is not required at this time; and the provisions of 4 CSR 240-3.570(2) (A)1-3 are not applicable to Applicant. Based upon the foregoing, Applicant respectfully requests a waiver of 4 CSR 240-3.570(2) (A)1-3. Since Lifeline support is designed to reduce the monthly cost of telecommunications services for eligible consumers, and 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.

10. Pursuant to 4 CSR 240-3.570(2)10, Applicant is committed to offer a local usage plan comparable to those offered by the incumbent local exchange carrier in the areas for which the carrier seeks designation. Applicant offers a local usage plan with unlimited calling within the customer's local calling area for a flat monthly fee with the same calling scope as AT&T. Applicant offers a basic plan, and a complete plan, which includes unlimited local calling and 10 calling features. Such commitment shall include a commitment to provide Lifeline and Link Up discounts and Missouri Universal Service Fund (MoUSF) discounts pursuant to 4 CSR 240-31, if applicable, at rates, terms and conditions comparable to the Lifeline and Link Up offerings and MoUSF offerings of the incumbent local exchange carrier providing service in the ETC service area. Since the incumbent local exchange carrier in the Designated Service Area does not offer services to the targeted low income consumer base that Applicant intends to serve, Applicant's proposed offerings of Lifeline and Link-Up services will clearly be in the public interest. The Applicant intends to provide customers service at the rates as follows, which is comparable to the plan offered by AT&T in the Designated Service Area as follows:

	AT&T		dPi	
Plan	Basic	Complete	Basic	Complete
Rate	\$13.75	\$30.00	\$19.95	\$29.95
FCC pass thru	\$ 6.50	\$ 6.50	\$ 6.50	\$ 6.50
911	\$ .50	\$ .50	\$ .50	\$ .50
Total Cost	\$20.75	\$37.00	\$26.95	\$36.95
Less Discount	\$13.50	\$13.50	\$13.50	\$13.50
Net Cost	\$ 7.25	\$23.50	\$13.45	\$23.45

Please note that in the State of Missouri, most of Applicant's current customers subscribe to the Complete Plan.

11. Under FCC and Commission guidelines, an ETC Applicant must demonstrate that it will satisfy applicable consumer protection and service quality standards. 47 CFR §54.202(a)(3); FCC ETC Order at Para 28; and 4 CSR 240-3.570 (2) 8. Applicant will satisfy all such standards. As part of its certification requirements for providing local exchange services, Applicant must abide by the service quality and consumer protection rules. In addition, Applicant commits to reporting information on consumer complaints per 1,000 lines on an annual basis consistent with the FCC's ETC Order. Applicant in general commits to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards.

12. Under FCC and Commission guidelines, an ETC Applicant must demonstrate its ability to remain functional in emergency situations. 47 CFR §54.202(a)(2); FCC ETC Order at Para 25; and 4 CSR 240-3.570 (2) 4. Since Applicant will provide service to its customers through the use of ILEC leased facilities, this arrangement allows Applicant to provide to its customers the same ability to remain functional in emergency situations as currently provided by the ILECs to their own customers, including access to a reasonable amount of back-up power to ensure functionality without an external power source, the ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes resulting from emergency situations.
  
13. Under FCC guidelines, an ETC Applicant must commit to provide service throughout its proposed designated service area to all customers making a reasonable request for service. FCC ETC Order at Para 22; 47 CFR §54.202(a)(1)(i). Applicant commits to provide service throughout its proposed ETC-designated service area to all customers making a reasonable request for service. Furthermore, as stated above, Applicant is eligible for ETC designation since it offers all of the supported services enumerated under Section 254(c) using facilities obtained as UNEs, or the equivalents thereof, through commercial agreements. According to FCC Rules, facilities obtained as UNEs satisfy the requirement that an ETC provide the supported services using either its own facilities or a combination of its own facilities and resale of another carrier's

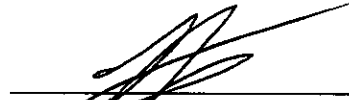
services. Although it has been argued in the Commission's Decision in Case No. CO-2006-0464, that Applicant is trying to reside on the outside fringes of what this Commission requires for ETC designation, because Applicant is making the most minimal commitment to satisfy the "own facilities" requirement for the provision of service, this is exactly what was contemplated by the FCC. Otherwise, no competitive carriers providing service without the use of its own facilities would ever be eligible for ETC designation, which is clearly not the case. Furthermore, unlike the applicant in Case No. CO-2006-0464, dPi is actually providing service in the State of Missouri by means of resale and UNE's. Based upon the foregoing, Applicant respectfully requests a waiver of the requirements of 4 CSR 240-3.570(2)(C) and 4 CSR 240-3.570(3)(C)(3). Since Applicant will be providing to service to customers only in the AT&T service area, the Applicant anticipates that it will be able to provide service to all customers making a reasonable request for service. However, in the event that Applicant is not able to provide service to a customer making a reasonable request for service in the Designated Service Area, pursuant to 4 CSR 240-3.570(3)(C)(3)(B), Applicant will attempt to offer resold service of other carriers that have facilities available to that premises. Furthermore, pursuant to 4 CSR 240-3.570(3)(C)(3)(D), if there is no possibility of providing service to the requesting customer, Applicant will notify the customer and include such information in Applicant's annual certification documentation to the Commission.

14. The Applicant has no pending actions or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment or decision has occurred within three (3) years of the date of this application. No Commission annual reports or assessment fees are overdue.
15. To the best of the Applicant's knowledge, its account is current with the FCC in regards to regulatory fees; and its account is current with the Universal Service Administrative Company in regards to universal service contributions. The Applicant is aware that there may be an audit of the use of universal service funds and that the eligible telecommunications service designation is reviewed annually by state commissions.
16. Applicant has been granted designated an ETC by the Alabama Public Service Commission, the North Carolina Public Utilities Commission, and the Texas Public Utility Commission. No state has denied any ETC petition filed by Applicant, nor have any such petitions been withdrawn. Applicant has petitions for ETC status pending in Arkansas, Florida, Georgia, Kansas, Louisiana, Oklahoma and South Carolina.

**V. Relief Requested**

For the foregoing reasons, dPi respectfully requests that the Commission grant its application and designate the Company as an ETC for the Designated Service Area.

**Respectfully submitted,**



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**Attorneys for Applicant**

## **LIST OF EXHIBITS**

- |                    |   |
|--------------------|---|
| <b>Exhibit I</b>   | <b>List of Exchanges</b>                          |
| <b>Exhibit II</b>  | <b>Sample Brochure</b>                            |
| <b>Exhibit III</b> | <b>Sample Newspaper Advertisement</b>             |
| <b>Exhibit IV</b>  | <b>2006 Lifeline Participation Rates by State</b> |



**Exhibit I**

**List of Exchanges**

**See Attached**

**AT&T Service Areas:**

<u>Adrian</u>	<b>Gideon</b>	<b>Risco</b>
<u>Advance</u>	<b>Glasgow</b>	<b>Rushville</b>
<b>Agency</b>	<b>Grain Valley</b>	<b>St. Marys</b>
<b>Altenburg-Frohna</b>	<b>Gray Summit</b>	<b>San Antonio</b>
<u>Antonia</u>	<u>Hayti</u>	<b>Scott City</b>
<b>Archie</b>	<b>Herculaneum-Pevely</b>	<b>Senath</b>
<b>Argyle</b>	<b>Higbee</b>	<b>Slater</b>
<b>Armstrong</b>	<u>Hillsboro</u>	<u>Smithville</u>
<b>Ash Grove</b>	<b>Holcomb</b>	<u>Springfield</u>
<b>Beaufort</b>	<b>Hornersville</b>	<u>St. Louis</u>
<b>Bell City</b>	<b>Jasper</b>	<u>Stanberry</u>
<b>Benton</b>	<b>Kansas City</b>	<b>Trenton</b>
<b>Billings</b>	<b>Lamar</b>	<b>Tuscumbia</b>
<b>Bismarck</b>	<b>LaMonte</b>	<u>Versailles</u>
<b>Bloomfield</b>	<b>Lancaster</b>	<b>Vienna</b>
<b>Bloomsdale</b>	<b>Leadwood</b>	<b>Walnut Grove</b>
<b>Bowling Green</b>	<b>Lilbourne</b>	<b>Wardell</b>
<b>Brookfield</b>	<b>Linn</b>	<b>Ware</b>
<b>Campbell</b>	<b>Lockwood</b>	<b>Wellsville</b>
<b>Cardwell</b>	<b>Louisiana</b>	<b>Westphalia</b>
<b>Carl Junction</b>	<b>Macks Creek</b>	<b>Wyatt</b>
<b>Carrollton</b>	<b>Malden</b>	
<b>Caruthersville</b>	<b>Marble Hill</b>	
<b>Center</b>	<b>Marceline</b>	
<u>Chaffee</u>	<b>Marionville</b>	
<b>Charleston</b>	<b>Marston</b>	
<b>Clarksville</b>	<b>Meta</b>	
<b>Clever</b>	<b>Montgomery City</b>	
<b>Climax Springs</b>	<b>Mourehouse</b>	
<b>Deering</b>	<u>New Franklin</u>	
<b>DeKalb</b>	<b>New Madrid</b>	
<b>Delta</b>	<b>Oak Ridge</b>	
<b>Downing</b>	<b>Old Appleton</b>	
<b>East Prairie</b>	<b>Oran</b>	

**Edina  
Elsberry**

**Essex  
Farley  
Fayette  
Fisk  
Frankford  
Freeburg**

**Patton  
Paynesville**

**Pierce City  
Pocohontas-New Wells  
Portage Des Sioux  
Portageville  
Puxico  
Qulin  
Richwoods**

**AT&T Service Areas (Continued):**

<b>Bonne Terre</b>	<b>Perryville</b>
<b>Boonville</b>	<b>Pond</b>
<b>Camdenton</b>	<b>Poplar Bluff</b>
<b>Cape Girardeau</b>	<b>Richmond</b>
<b>Carthage</b>	<b>St. Charles</b>
<b>Cedar Hill</b>	<b>St. Clair</b>
<b>Chesterfield</b>	<b>St. Joseph</b>
<b>Chillicothe</b>	<b>Sedalia</b>
<b>DeSoto</b>	<b>Sikeston</b>
<b>Dexter</b>	<b>Union</b>
<b>Eldon</b>	<b>Valley Park</b>
<b>Eureka</b>	<b>Washington</b>
<b>Excelsior Springs</b>	<b>Webb City</b>
<b>Farmington</b>	
<b>Fenton</b>	
<b>Festus-Crystal City</b>	
<b>Flat River</b>	
<u><b>Fredericktown</b></u>	
<b>Fulton</b>	
<b>Gravois Mills</b>	
<b>Greenwood</b>	
<b>Hannibal</b>	
<b>Harvester</b>	
<b>High Ridge</b>	
<b>Imperial</b>	
<b>Jackson</b>	
<b>Joplin</b>	
<b>Kennett</b>	
<b>Kirksville</b>	
<b>Knob Noster</b>	
<b>Lake Ozark-Osage Beach</b>	
<b>Manchester</b>	
<b>Marshall</b>	
<b>Maxville</b>	
<b>Mexico</b>	
<b>Monett</b>	
<b>Moberly</b>	
<b>Neosho</b>	
<b>Nevada</b>	
<b>Pacific</b>	

**Exhibit II**  
**Sample Brochure**

**1** Call **1-877-JOIN-DPI**  
(564-6374)

or see a Store Associate  
for more details.

**2** Choose a package to  
fit your budget &  
your lifestyle.

- Call waiting
- Caller ID
- Unlimited long distance
- & More!

**3** **SAVE \$40\***  
up to

when you sign up today!

\*Savings will vary by service address. See Store Associate  
for more details.

**No Deposit!**

**No LD. Required!**

**No Credit Checks!**

**4** Get Signed Up  
**Today!**  
at

**Rent-A-Center**

CALL

**1-800-877-7758**

**TAKE ONE!**

# Home Phone for Everyone!

at your local **Rent-A-Center**

**Packages to fit any budget**

Save up to **\$40 Today!**

\*Savings will vary by service address. See Store Associate for more details.



**Call toll free 1-877-JOIN-DPI**  
(564-637)

**Exhibit III**

**Sample Newspaper Advertisement**



# Wireless Phone Service

as low as \$9.99/week!

Nationwide Coverage, Web Surfing,  
Web Picture Mail, and Text Messaging!

## Wireless Call Features

Unlimited Nights & Weekends  
Unlimited Long Distance  
Call Waiting Deluxe  
Caller ID Deluxe  
3-Way Calling  
Call Return & Busy Signal  
Web Surfing  
Web Picture Mail  
Text Messaging

## Cellular Recharge!

Buy more minutes for your  
cell phone at any dPI  
payment center!

at&t TRACFONE lltel

Com T-Mobile verizon



Phones not available at all retailers.

## Wireless Plans

### WEEKLY

dPI Wireless 25

dPI Wireless 50

### MONTHLY

dPI Wireless 100

dPI Wireless 200

dPI Wireless 300

dPI Wireless 500

dPI Wireless 1000

ALL PLANS INCLUDE UNLIMITED NIGHTS & WEEKENDS!

# Home Phone WITH

Unlimited Long Distance  
or Internet! Only \$9.99/week

+ taxes & fees

- ★ NO DEPOSIT
- ★ NO ID REQUIRED
- ★ NO CREDIT CHECK
- ★ NO LONG TERM OBLIGATION

## Home Phone Call Features

Unlimited Local Calling  
Unlimited Long Distance  
Call Waiting Deluxe  
Caller ID Deluxe  
3-Way Calling  
Call Return & Busy Signal



Authorized Reseller

AT&T (Bell South)

Windstream (Alltel)

Windstream (Alltel)

Embargo (Sprint)

Century-Tel

Verizon

## Life Line

Unlimited Local Calling  
with Qualifications

\$4.99/wk / \$19.99/mo

## Basic

Unlimited Local Calling

\$7.49/wk / \$29.99/mo

## Advantage

Unlimited Local Calling  
Call Waiting Deluxe  
Caller ID Deluxe

\$9.24/wk / \$36.99/mo

## Premier

Unlimited Local Calling  
Call Waiting Deluxe  
Caller ID Deluxe  
3-Way Calling  
Call Return & Busy Redial

\$9.24/wk / \$39.99/mo

\$14.24/wk / \$56.99/mo

\$16.99/wk / \$67.99/mo

\$14.24/wk / \$56.99/mo

\$14.24/wk / \$56.99/mo

\$14.24/wk / \$56.99/mo

\$14.24/wk / \$56.99/mo

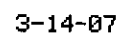
\$14.24/wk / \$56.99/mo

**Exhibit IV**

**2006 Lifeline Participation Rates by State**

**See Attached**

- ## 2006 Lifeline Participation Rates by State



**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a true copy of the foregoing Amended Application upon the following parties, listed below, in accordance with Commission rules.

Dated this 16 day of Jul, 2008.

  
\_\_\_\_\_  
Lance J.M. Steinhart  
Georgia Bar No. 678222

Counsel for

**dPi Teleconnect, LLC**

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