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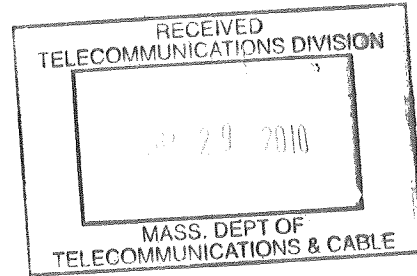
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March 26, 2010

VIA OVERNIGHT DELIVERY

Catrice Williams, Secretary
Department of Telecommunications and Cable
Admin. Division
One South Station, Second Floor
Boston, Massachusetts 02110



Re: BLC Management LLC d/b/a Angles Communication Solutions
D.T.C. 09-2

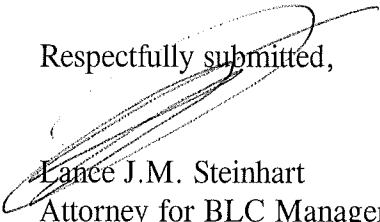
Dear Ms. Williams:

Enclosed please find one original and one unbound copy of BLC Management LLC d/b/a Angles Communication Solutions' Record Request No. 1 of the Department of Telecommunications and Cable, as well as a Motion for Protective Order for Non-Disclosure.

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

Please acknowledge receipt of this filing by returning the duplicate copy of this letter in the enclosed, self-addressed envelope. Thank you.

Respectfully submitted,


Lance J.M. Steinhart
Attorney for BLC Management LLC
d/b/a Angles Communication Solutions

Enclosures

c: Brian Cox
Betsy S. Whittey, Hearing Officer
Service List:

Martin O'Malley, Verizon
Alexander Moore, Esq., Verizon New England, Inc.
Karen Melanson, Verizon
Christopher Bean, Esq., Verizon

**RECORD REQUEST NO. 1 OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO BLC MANAGEMENT LLC
D/B/A ANGLES COMMUNICATION SOLUTIONS ("BLC")**

D.T.C. 1 Identify all companies under the ATMS "umbrella", indicate the date(s) they were acquired by ATMS, and provide a complete list of the states in which they provide ETC and non-ETC services.

RESPONSE: <u>NAME OF COMPANY</u>	<u>DATE ACQUIRED</u>
LifeConnex Telecom, LLC	9/1/09
Bellerud Communications, Inc.	9/1/09
Triarch Marketing, Inc.	10/9/09
American Dial Tone, Inc.	9/30/09
BLC Management, LLC d/b/a Angles Communications	11/30/09
SC TxLink, LLC	11/30/09
REN-TEL Communications, Inc.	11/30/09
DIAL-TONE & MORE, INC.	11/30/09
See attached for list of states.	

All Contacts Providing Information/Response for the above question:

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

And

Lance J.M. Steinhart, Esq.
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	Bellerud	TriArch	ADT	LifeConnex	Angles	DialTone & More	Rentel	SCTX Link	Affordable
Alabama	Active ETC		Active	Active ETC	Active ETC				
Alaska									
Arizona									
Arkansas	Active ETC								
California									
Colorado									
Connecticut									
Delaware									
Florida	Active		Active ETC	Active	Active				
Georgia						Active			
Hawaii									
Idaho									
Illinois									
Indiana	Active								
Iowa									
Kansas									
Kentucky	Active		Active	Active ETC	Active ETC				
Louisiana		Active ETC			Active ETC				
Maine									
Maryland									
Massachusetts									
Michigan									
Minnesota									
Mississippi					Active				
Missouri							Active		
Montana			Active						
Nebraska									
Nevada									
New Hampshire									
New Jersey									
New Mexico									
New York									
North Carolina				Active ETC	Active ETC				
North Dakota									
Ohio									
Oklahoma									
Oregon									
Pennsylvania									
Rhode Island									
South Carolina	Active					Active			
South Dakota									
Tennessee			Active		Active				
Texas	Active		RETP					Active ETC	
Utah									
Vermont									
Virginia									
Washington				Active					
West Virginia									
Wisconsin									
Wyoming									

A = Active

E = ETC

S= Application Submitted

P = Pending ETC status

RETP = Resale Texas

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D.T.C. 2 Identify where each company acquired by ATMS has been designated as an ETC.

RESPONSE: Bellerud Communications, Inc.
Designated as an ETC in Alabama and Arkansas

Triarch Marketing, Inc.
Designated as an ETC provider in Louisiana

LifeConnex Telecom, LLC
Designated as an ETC provider in Alabama, Iowa, Kansas, Kentucky, North Carolina, New York, South Carolina, Tennessee and Wisconsin

American Dial Tone, Inc.
Designated as an ETC provider in Florida

BLC Management, LLC d/b/a Angles Communications
Designated as an ETC provider in Alabama, Iowa, Illinois, Kentucky, Louisiana, and North Carolina

SC TxLink, LLC
Designated as an ETC provider in New York and Texas

REN-TEL Communications, Inc.
Not currently designated as an ETC provider.

DIAL-TONE & MORE, INC.
Not currently designated as an ETC provider.

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D.T.C. 3 Provide documents describing the processes and mechanics that the ATMS companies have to avoid "double-dipping"/"double-dipping" in respect of federal subsidies in territories cover by multiple ATMS companies.

RESPONSE: Our third-party vendor Lost Key Telecom contracts DBE to perform a data scrub on all 497's filings by removing all subscribers that have received any Lifeline/Link-up subsidies from the incumbent carrier billing in the same month. The data scrub is accomplished by identifying all subscribers with Lifeline/Link-up universal service ordering codes in the electronic billing data. These subscribers are eliminated from the 497 filings.

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D.T.C. 4

- A. Identify each state in which Angles has withdrawn and ETC application and the reasons for the withdrawal.

RESPONSE: CALIFORNIA – CLEC license lapsed because not exercised, made application moot.

FLORIDA – CLEC license revoked for failure to file reports, made application moot.

IDAHO – Withdrew in order to complete interconnection agreement.

- B. Identify each state in which Angles' ETC application has been denied.

RESPONSE: None.

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- C. Identify the reasons why Angles is not pursuing its ETC application in the state of Florida.

RESPONSE: See A. above

- D. Confirm whether Angles is receiving USAC distributions/has Lifeline customers in New York, Texas, and Illinois.

RESPONSE: No.

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- E. Describe the current status of Angles' ETC applications in Vermont, New Jersey, Rhode Island, Pennsylvania, Tennessee, Idaho, Kansas, and Montana.

RESPONSE: All pending except Idaho, See A. above.

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D.T.C. 5 Describe the current status of the AT&T North Carolina vs. Angles proceeding before the North Carolina Utilities Commission (Docket No. P-55, Sub 1787)

RESPONSE: AT&T filed a complaint against BLC Management LLC, dba Angles Communications along with eight (8) other CLECS before every state commission in the former BellSouth region. The complaint concerns whether AT&T is properly passing on to the CLECs the full benefits of promotional offers. The complaints were filed in January 2010 and the CLECs are now in the process of filing responses, motions to dismiss and counter claims against AT&T. The matters are expected to be resolved by the end of 2010.

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D.T.C. 6 To clarify some discrepancies in the documents, when precisely did
Angles start providing services/having customers?

RESPONSE: Angles started providing services/having customers in May of 2005.

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D.T.C. 7 Provide examples of likely TV and print advertising to be conducted in Massachusetts.

RESPONSE: Please see attached (Marked as Confidential)

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D.T.C. 8 Specify the sections in the Verizon-Angles interconnection agreement that deal with how emergency situations will be addressed as described in DTC 1-11 and Angles' response thereto.

RESPONSE: To the company's knowledge, the Verizon-Angles interconnection agreement does not deal with how emergency situations will be addressed as described in DTC 1-11 and Angles' response thereto. The company does reiterate its response here by reference. Since BLC will be providing Lifeline services as an ETC using facilities leased from Verizon, the company definitely assumes that emergency situations addressed will be handled by Verizon for BLC customers in the same manner as such emergency situations are handled for Verizon customers. If that is not the case, BLC and the Department would be warranted to have Verizon explain why this would not be the case.

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D.T.C. 9 Provide training and employee manuals and materials to be deployed in Massachusetts that address practices and timelines for the following matters and issues: billing, termination, slamming and consumer protection, complaint mediation and resolution, and governmental agency and Better Business Bureau complaints.

RESPONSE: Please see attached (Marked as Confidential)

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D.T.C. 10 Provide samples of bills and scripting of discussions with customers.

RESPONSE: Please see attached (Marked as Confidential)

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D.T.C. 11 Specify how resale and lease elements will be administered.

RESPONSE: All subscribers will be provisioned on the incumbent carrier's resale platform for the initial month and in the proceeding month's utilization of UNE and 321Communications facilities.

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D.T.C. 12 Provide documentation for pricing and descriptions of bundled plans for Lifeline and non-Lifeline customers, differences in pre- and post-pay options, and details for how consumers are given information (e.g., phone numbers to call, charges, etc.)

RESPONSE: Please see attached (Marked as Confidential)

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D.T.C. 13 Provide documents that substantiate the assertions made by Angles in its responses to D.T.C. 1-14.

RESPONSE: Please see response to D.T.C. 15.

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D.T.C. 14 Provide detail for how rates are calculated for all of the products intended to be offered in Massachusetts.

RESPONSE: Please see attachment to D.T.C. 12.

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D.T.C. 15 Provide evidence supporting Angles' assertion of customers being denied services from Verizon and others because of credit requirements.

RESPONSE: The typical low income customer in most cases does not have any credit at all and prefers dealing with a company that will provide them with a flat rate service with features in a prepaid product. In a post paid credit approved environment most low income customers are not comfortable with the process of attaining service with a sales representative that is driven to sell more. Please see the attached documents which demonstrate some of the barriers to entry for the low income customer "Blog copied from the Verizon Website"; "Verizon Massachusetts Lifeline Tariff Language" and "AARP E-Mail about Verizon".

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Verizon Massachusetts Lifeline Tariff Language

15.5.1.C

Local and toll package **is not available to customers receiving a lifeline reduction in monthly basic exchange service rates.**

15.6.1.D

Verizon Local Package Extrasm/Verizon Local Packagesm **is not available to customers receiving a lifeline reduction in monthly basic exchange service rates.** Verizon Local Package Extrasm/Verizon Local Packagesm is also not available to customers with ISDN, Centrex, Student Centrex services.

15.7.1.E

Multi-line package bonus discount **is not available on services for which customers are receiving a lifeline reduction in monthly rates.**

E-mail from AARP and the Office Public Counsel State of Florida

From: Mike Twomey [mailto:miketwomey@talstar.com]

Sent: Tuesday, February 27, 2007 4:35 PM

To: Samantha Cibula

Subject: Re: Lifeline Post-Workshop Comments

Samantha,

Please accept this email as AARP's Post-Workshop Comments related to the rule development workshop held by staff on February 6, 2007.

AARP adopts as its own the comments of the Office of Public Counsel contained in the email message below sent to you earlier today by Charlie Beck of that office.

Additionally, AARP wants to remind all concerned that our 12.7 percent enrollment rate, aside from being one of the lowest in the nation, reflects the fact that over one million households in the state who are eligible for Lifeline financial assistance do not receive it. Were all of those families receiving assistance, they and the state of Florida would be enriched by approximately \$162 million annually.

Furthermore, a more respectable enrollment rate could stop the state from remaining the largest net contributor (or loser) to the national Lifeline fund. As you may be aware, in the most recent year for which records are kept, 2005, we had a net contribution to the Lifeline fund, alone, of \$41.1 million. For the five year period from 2001- 2005 the total net contribution was \$161.8 million, an embarrassingly large number contributed to by all of us with landline phone service, including the many low-income persons eligible for Lifeline assistance but not receiving it.

Best regards,

Mike Twomey

For AARP

BECK.CHARLES wrote:

Samantha:

This e-mail follows up on the rule development workshop held at the Florida Public Service Commission on February 6, 2007. I want to reiterate our overall support for the rules proposed by staff.

More Must be Done to Increase Lifeline Enrollment_

According to the Florida Public Service Commission's report on Lifeline submitted to Governor, President of the Senate, and Speaker of the House on December 28, 2006, Lifeline enrollment as of September, 2006 stood at 145,734 participants, reflecting a 12.7% participation rate. This participation rate barely exceeds the participation rate of 12.4% recorded in September, 2005, and is lower than the paltry participation rates recorded from 1998 through 2004.

/See/ Table 2, /Number of Customers Subscribing to Lifeline Service and the Effectiveness of Procedures to Promote Participation/, Florida Public Service Commission, December, 2006.

This is not to say that efforts have not been made by many to increase awareness about the availability of Lifeline services. /See/ /Petition to Implement Automatic Enrollment for Lifeline Service/ filed by the Office of Public Counsel and AARP on October 11, 2006, at pages 2-3 for a brief overview of these efforts. Rather, despite these efforts, the Lifeline participation rate still remains far too low -- and far below the national average for Lifeline participation rates. The low Lifeline participation rates in Florida compared to the rest of the country should be kept in mind as the Commission considers rules governing Lifeline service.

The Office of Public Counsel supports the rules proposed by staff because the new rules should make existing Lifeline enrollment a more user-friendly procedure for participants. However, the rules do not address what we consider the most important step that must be taken to increase participation: automatic enrollment. We remain convinced that automatic enrollment will be the most effective means to increase participation in Lifeline.

Lifeline Subscribers Should Be Allowed to Purchase Packages of Services as Part of their Lifeline Service__

One important way to make Lifeline more attractive to eligible subscribers is to allow subscribers to purchase the types of services they want to purchase while maintaining their eligibility for a Lifeline credit. At the workshop Ms. White of the Office of Public Counsel testified that many lifeline customers would like to subscribe to packages of services. They may feel that a package contains the most economical bundle of services that meets their needs. Elderly lifeline eligible subscribers may want caller ID in particular to avoid scams or telemarketers who target the elderly. Long distance is a bundled feature desired by lifeline eligible customers because they may have friends and family in other states with whom they want to communicate.

From February 2005 through January 2007 the Office of Public Counsel talked with approximately 170 Verizon Lifeline applicants who expressed concern that Verizon would not allow them to subscribe to a package and receive the Lifeline credit. Sometimes the applicants gave up their package in order to get the credit, and others kept the package while forfeiting the Lifeline credit for which they would otherwise be eligible.

All packages offered by the companies should be eligible for the Lifeline credit in order to promote lifeline participation and to provide Lifeline subscribers services which meet their needs. Offering the Lifeline credit only with the basic bundled package would be an improvement over the requirements which exist today, but it is still a second best alternative.

The Rules Should Require ETCs to Provide a Receipt to Applicants

The Office of Public Counsel frequently receives complaints from customers stating that they have not received a Lifeline credit, even though they sent a Lifeline application to their ETC months before.

Subsequent to the workshop, the following information was provided to BellSouth, Verizon and Sprint:

1. On average, we receive 75 calls per week from people who tell us that they have sent their Lifeline application to a company, but the company claims to have not received it.
2. On average, we receive 77 calls per week from people who tell us that they sent their Lifeline recertification to a company, but the company claims to have not received it.
3. Approximately 10% of these calls are from BellSouth customers, 10% are from Embarq customers, and 80% are from Verizon customers.

It turns out that sometimes the Lifeline applicant sent their materials to the wrong address, and the process of determining what went wrong can take more than three months to resolve. Lifeline applicants find these to be an extremely frustrating experience, and many quit pursuing Lifeline or decide to apply for Lifeline through the Office of Public Counsel rather than through the company. Requiring the companies to provide a receipt to Lifeline applicants when the companies receive the application would mitigate the frustration experienced by Lifeline applicants in these situations.

Blog copied from the Verizon Website

My First Month's Bill for Telephone/Internet for \$216.00 I'm Cancelling Tomorrow

09-10-2008 10:40 PM

First of all, I was charged for 5 days of service I did not even get. I was stupid enough to choose the Verizon Long Distance Plan. I thought I was choosing the 5 ¢ a minute plan, but, nope, I chose the mindless \$.40 a minute plan. Can you imagine how that adds up. And, you would not believe all the add on fees that were charged. Fees they never told you about. I am also a Lifeline customer, but do you think made the correct adjustments for these credits. Nope! I spend hours on the phone with these customer service people. Do you think any customer service person in their right mind would recommend the Verizon long distance plan when for \$.40 when they could have as easily recommended a plan for \$.05 a minute. So, first thing tomorrow I am calling, after less than a month, to cancell ALL my services.

I AM SO ASHAMED OF MYSELF< ESPECIALLY WITH THE LONG DISTANCE AT ALLOWING MYSELF TO BE CONNED AND DUPED LIKE THIS>

People, get smart about these teaser rates. That's all they are. I originally ordered a residence line for \$17.66, Sensible minutes for \$1.99, \$1.25 non listing in the directory, \$6.50 Interstate Subscriber Link. But, get this, My Basic Charges ended up at \$74.28. My non basic charges, ended up at \$.83.00, taxes, \$46.00 for then to turn on a phone line. \$59.21 for internet. Duped. What an Idiot. And, the sad thing is, I just dont know what I am going to do to pay for all of this.

Re: My First Month's Bill for Telephone/Internet for \$216.00 I'm Cancelling Tomorrow

09-12-2008 10:57 PM

We're in the same boat here. When I confirmed my order I was told with the triple package it would be \$105 per month. 1st month bill with one week pro-rated was \$185 BUCKS!!! I called billing and they gave me the oooh your bill will go down to the regular monthly rate on the second bill. 2nd bill come and it's even more....\$191 bucks...I'm cancelling first thing Monday morning. My phone bill was \$61 bucks...for what? I looked at my FIOS TV and they charged me 5.99 for STARZ internet service (didn't sign up for that), another 4.99 for some Internet Security Suite 3 (didn't sign up for that either)...wierd fees on the phone bill (long distance charges I didn't sign up for)...I'm so pissed. Ther early termination fee is LESS than my friggin bill. Consider them cancelled.

Re: My First Month's Bill for Telephone/Internet for \$216.00 I'm Cancelling Tomorrow

09-13-2008 08:08 AM

sfbond, that sounds like an absolute nightmare plus early termination fees. Maybe a call to customer service? I actually did call customer service over these issues. I lucked out. I ended up talking with a knowledgeable, concerned, and smart rep, who had empathy for my situation. Not, the usual, ah, I'm not sure person with an edge, or the I am sure rep who really does not know what he or she is doing and/or does not follow through. Or, the oh, I'm so sorry but what can I do about it rep. She was able to get the long distance mess straightened out. Apparently, despite my previous calls, no customer service rep ever bothered to sign me up for any long distance as I requested. So, we looked at the situation and she signed me up for the Freedom Plan, backdated it to September 1. When I complained about my high cell bill from being on hold with Verizon, she offered a \$25.00 credit. She is also putting in a claim check the 74.00 long distance charges. Chances are good on this, she said. Why this could take up to two=three months is beyond me, but I am willing to give it a try. I will cancel everything if that is not approved, but, so far, so good. I never set up anything on a 12 month plan, meaning the internet is more expensive, but I just did not commit to internet plans because of how difficult it was to set up the phone. So, no one can sock me with early termination plans. My advice, call, and, if you are lucky, really this is a luck of the draw, you just might get a customer rep with all of the above qualities who works with the customer and the system to find solutions. If you do not like the attitude of the rep, hang up and try again. There's always good people in not so great systems that are exemplary.

Re: My First Month's Bill for Telephone/Internet for \$216.00 I'm Cancelling Tomorrow

09-13-2008 09:46 AM

Thanks so much for coming back and giving us an update

**RECORD REQUEST NO. 1 OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO BLC MANAGEMENT LLC
D/B/A ANGLES COMMUNICATION SOLUTIONS ("BLC")**

D.T.C. 16 Provide financial statements for 2008-2009 (note: the DTC was not clear for which company or companies)?

RESPONSE: Please see attached (Marked as Confidential)

All Contacts Providing Information/Response for the above question:

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**RECORD REQUEST NO. 1 OF THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO BLC MANAGEMENT LLC
D/B/A ANGLES COMMUNICATION SOLUTIONS ("BLC")**

D.T.C. 17 Provide documentation, including training materials and descriptions of the verification and certification process for Lifeline eligibility, including how that process is executed in Kentucky and under FCC guidelines (e.g., statistical sampling).

RESPONSE: **Please see attached (Marked as Confidential)**

All Contacts Providing Information/Response for the above question:

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