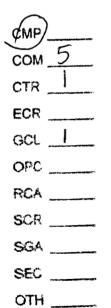
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DOCKET NO. 080065-TX: Investigation of Vilaire Communications, Inc.'s eligible telecommunications carrier status and competitive local exchange company certificate status in the State of Florida.

WITNESS: Direct Testimony Of Intesar Terkawi, Appearing On Behalf Of Staff

DATE FILED: April 10, 2008



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0000MENT NUMBER-DATE 0 2 8 0 2 APR 10 8

APR 10 PH 4:5

FPSC-COMMISSION CLERK

1	DIRECT TESTIMONY OF INTESAR TERKAWI	
2	Q. Please state your name and business address.	
3	A. My name is Intesar Terkawi and my business address is 2540 Shumard Oal	k
4	Blvd., Tallahassee, Florida, 32399-0850.	
5		
6	Q. By whom are you presently employed and in what capacity?	
7	A. I am employed by the Florida Public Service Commission as a Regulatory	У
8	Analyst II in the Division of Regulatory Compliance and Consumer Assistance.	
9		
10	Q. How long have you been employed by the Commission?	
11	A. I have been employed by the Florida Public Service Commission (FPSC) since	Э
12	October, 2001.	
13		
14	Q. Briefly review your educational and professional background.	
15	A. I attended the University of Central Florida and in 1993, I received a Master of	f
16	Arts in Communication and in 2001 I received a Bachelor of Science degree with a	a
17	major in Accounting. I am also a Certified Public Accountant licensed in the State of	f
18	Florida and an Enrolled Tax Agent licensed by the Department of Treasury.	
19		
20	Q. Please describe your current responsibilities.	
21	A. Currently, I am a Regulatory Analyst II with the responsibilities of planning	5
22	and directing audits of regulated companies. I am also responsible for creating audit	t
23	work programs to meet a specific audit purpose.	
24		
25	Q. What is the purpose of your testimony today@DOUMENT NUMBER -DATE	

TRAD CONTRACTOR OF TOK

. . . .

1	A. The purpose of my testimony is to sponsor the staff audit report of Vilaire
2	Communications, Inc. (VCI) which addresses the company's compliance with the Low
3	Income Mechanism requirements of the Universal Service Administrative Company's
4	(USAC). The Audit Control Number is 07-250-1-2. This audit report is filed with my
5	testimony and is identified as Exhibit IT-1. The audit work papers are also filed with
6	my testimony. The work papers that are not held as confidential are identified as
7	Exhibit IT-2. Those audit work papers that are being held by the Commission as
8	confidential, based on the company's claim of confidentiality, are identified as Exhibit
9	IT-3.
10	
11	Q. Did you prepare this audit report?
12	A. Yes, I was the audit manager in charge of the audit.
13	
14	Q. Please describe the work performed in this audit.
15	A. I recalculated the amounts on the FCC 497 forms by multiplying the number of
16	customers on the subscriber listings by the approved rate for the period from June 1,
17	2006 through June 30, 2007. I compared the number of customers shown on the same
18	forms to the number of customers on the subscriber listings for each month of the audit
19	period. I also reconciled the amounts on the forms to Commission Order No. PSC-06-
20	0436-PAA-TX, issued May 22, 2006 and reconciled the rates to the approved tariff.
21	I also recalculated the amounts from the invoices, for monies spent for
22	advertisement for the LifeLine and LinkUp programs for the period from June 1, 2006
23	through June 30, 2007. I obtained the text the company uses for advertisement and
24	determined that the company uses three TV stations to advertise the LifeLine and
25	LinkUp programs.

. . . .

1 I reviewed the company's process for termination of LifeLine customers for 2 failure to verify eligibility. I reviewed the company's statement that VCI sends a customer a separate letter from the monthly bill informing the customer of the 3 4 impending termination and allowing the customer 60 days to appeal. I requested the 5 company provide a list of LifeLine customers that were terminated during our audit period, a copy of the termination letters, and the next three bills subsequent to the 6 7 termination letters of each customer terminated. The company responded that no 8 Florida customers had been terminated for ineligibility due to the fact that the company 9 had not been in Florida for an entire year. The audit was concluded in November, 10 2007. The company's first verification of continued eligibility for Florida customers 11 was to be conducted in January of 2008.

Regarding the customer line count shown on the FCC 497 forms, I reviewed the phone numbers on the subscriber listings for LifeLine and LinkUp programs for duplicates and obtained a statement from the company stating that all subscribers are residential customers.

I recalculated the incremental costs for toll limitation services reported on the
FCC 497 forms. I tested the months of June 2006, July 2006, and May 2007 and
obtained the recurring and the non-recurring costs of the company's sole underlying
carrier. I confirmed with the company that the toll limitation service is being selected
by the customer, and is not required by the Company.

21

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22 Q. Please review the audit findings in the audit report.

23 A. <u>Audit Finding No. 1</u>

Audit Finding No. 1 discusses the company's books and records. On May 22,
2006, the Commission designated VCI as an Eligible Telecommunications Carrier

- 3 -

(ETC) in AT&T's service area (see Order No. PSC-06-0436-PAA-TX, issued May 22,
 2006, in Docket No. 060144-TX.) As an ETC, the company is required to follow the
 rules promulgated by the Federal Communications Commission (FCC). As a
 certificated CLEC in Florida, the company is required to follow the statutes and rules
 promulgated by the FPSC.

FCC Rule 47 CFR 54.417 addresses recordkeeping requirements as follows:
"Eligible telecommunications carriers must maintain records to
document compliance with all Commission and state requirements
governing the LifeLine/LinkUp programs for the three full
preceding calendar years and provide that documentation to the
Commission or Adminstrator upon request"

12 Further, Section 364.183(1), Florida Statutes, states:

The commission shall have access to all records of a telecommunications company that are reasonably necessary for the disposition of matters within the commission's jurisdiction. ... The commission may require a telecommunications company to file records, reports or other data directly related to matters within the commission's jurisdiction in the form specified by the commission...

FCC Form 499Q is filed quarterly and reports revenue on an aggregate basis and FCC Form 499A reports revenues annually. I requested detailed documentation to support the dollar amounts shown on FCC Form 499Q and FCC Form 499A. The company responded that they would be unable to comply, and stated that the "data reported on FCC Forms 499Q and 499A are comprised of aggregate figures, including data from all states in which VCI provides service. Forms 499Q and 499A do not

- 4 -

1 provide for the reporting of data on a state-by-state basis."

I also requested and was provided detailed documentation (invoices) to support the dollars spent on advertising for each of the LifeLine/LinkUp programs. However, I was unable to reconcile the advertisement expense to the general ledger and the Company was also unable to reconcile the costs because the records for advertisement costs per state are not kept.

Audit staff requested support for the revenues reported on the Regulatory
Assessment Fee return filed with this Commission for 2006. The Company did not
provide the requested support.

10 Audit Finding No. 2

Audit Finding No. 2 discusses the company's filing with USAC and the FPSC.
USAC reimbursed the company in the amount of \$234,901 for LifeLine, LinkUp, and
Toll Limitation Service for the period from June 1, 2006 through December 31, 2006.
The company reported revenues to the FPSC on its 2006 Regulatory Assessment Fee
form of \$64,449.

The company was not able to provide the documents to support the revenue on the RAF return. The company's response was that the revenue reported on the 2006 RAF annual return filed with Florida Public Service Commission was correct, and the amounts reported on FCC 497 forms were reimbursements for LifeLine, LinkUp programs, and Toll Limitation Service costs. The company's response does not address why the revenues received from USAC are significantly higher than those revenues reported to the FPSC.

23 Audit Finding No. 3

- 24
- 25

1	Audit Finding No. 3 discusses the reported line counts for LinkUp service. I
2	reviewed the phone numbers reported on the subscriber listings for the LinkUp
3	program for June 1, 2006 through June 30, 2007 and found 546 duplicates.
4	
5	Q. Does this conclude your testimony?
6	A. Yes, it does.
7	
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BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

of DOCKET NO. 080065-TX In Investigation Vilaire re: Communications, Inc.'s eligible telecommunications carrier status and DATED: APRIL 10, 2008 exchange competitive local company certificate status in the State of Florida.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the DIRECT TESTIMONY OF

INTESAR TERKAWI has been served by U.S. Mail to Beth Keating, Akerman Senterfitt Law

Firm, 106 East College Avenue, Suite 1200, Tallahassee, Florida 32301, behalf of VILAIRE

COMMUNICATIONS, INC., this 10th day of April, 2008.

. . .

LEE ENG TAN

Senior Attorney FLORIDA PUBLIC SERVICE COMMISSION 2540 Shumard Oak Boulevard Tallahassee, Fl 32399 (850) 413-6185 DOCKET NO. 080065-TX: Investigation of Vilaire Communications, Inc.'s eligible telecommunications carrier status and competitive local exchange company certificate status in the State of Florida.

WITNESS: Direct Testimony Of Intesar Terkawi, Appearing On Behalf Of Staff

EXHIBIT IT-1: Audit Report

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DOCUMENT NUMBER-CATE 02802 APR 10 8 FPSC-COMMISSION CLERK

1.1

Docket No. 080065-TX Exhibit IT-1 (Page 1 of 8) Audit Report



FLORIDA PUBLIC SERVICE COMMISSION

1.1

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DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE BUREAU OF AUDITING

Tallahassee District Office

VILAIRE COMMUNICATIONS, INC. (VCI)

LOW INCOME BENEFICIARY AUDIT

THIRTEEN MONTH PERIOD ENDED JUNE 30, 2007

UNDOCKETED

AUDIT CONTROL NO. 07-250-1-2

Intesar Terkawi, Audit Manager

m

Lyna M. Deamer, Audit Supervisor

DOLUMENT NUMBER-DATE 02802 APR 10 8 **FPSC-COMMISSION CLERK**

Docket No. 080065-TX Exhibit IT-1 (Page 2 of 8) Audit Report

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	ILING WITH USAC AND FPSC	

DOCUMENT NUMBER-DATE II 02802 APR 10 % FPSC-COMMISSION CLERK

Docket No. 080065-TX Exhibit IT-1 (Page 3 of 8) Audit Report

DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE AUDITOR'S REPORT

1

November 5, 2007

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures enumerated later in this report to meet the agreed upon objectives set forth by the Division of Competitive Markets and Enforcement in its audit service request. We have applied these procedures to the schedules prepared by Vilaire Communications, Inc. (VCI) in support of its filing for Reimbursement from the Universal Service Fund.

This audit is performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures which are only for internal Commission use. There are confidential workpapers in this audit.

02802 APR 10 8

FPSC-COMMISSION CLERK

OBJECTIVES and PROCEDURES

VERIFICATION OF FILING WITH USAC

Objective: - To determine if the amounts reported for reimbursement from the Universal Service Fund are supported by the Company's books and records for the period from June 1, 2006 – June 30, 2007.

Procedures: - Auditor recalculated the amounts on the Forms FCC 497 by multiplying the number of customers on the subscriber listings by the approved rate for the period from June 1, 2006 – June 30, 2007. Auditor reconciled the number of customers shown on the Forms FCC-497 to the number of customers on the subscriber listings for each month of the audit period. Auditor reconciled the amounts on the Forms FCC-497 to the FPSC Order No. PSC-06-0436-PAA-TX, issued May 22, 2006. Auditor reconciled the rate on the thirteen months Forms FCC-497 to tariff. Audit Finding No. 2 discusses the problems of reconciling the Forms FCC-497 to the general ledger, to the Regulatory Assessment Fee form filed with this Commission for 2006, the FCC Forms 499-Q, and the FCC 499A.

ADVERTISEMENT

Objective: - To determine if the company advertised for the LifeLine and LinkUp programs, and to examine the advertisement for the different types of services and service rates it offers for the period from June 1, 2006 – June 30, 2007.

Procedures: - Auditor recalculated the amounts spent for advertisement for the LifeLine and LinkUp programs for the period from June 1, 2006 – June 30, 2007 from the invoices. Auditor obtained the text the company uses for advertisement. Auditor could not reconcile the amount of advertisement to the general ledger, as the company does not keep separate records of advertisement expenses per state. The company uses three TV stations to advertise for the LifeLine and LinkUp programs.

TERMINATION

Objective: - To determine if the company allowed the subscribers 60 days grace period following the date of impending termination letter to demonstrate continued eligibility as per Section 364.10 (2), Florida Statutes "An eligible telecommunication carrier shall allow a subscriber 60 days following the date of the pending termination letter to demonstrate continued eligibility".

Procedures: - Auditor obtained a document from the company stating that VCI would send a customer a separate letter from the monthly bill informing the customer of the termination, and give the customer 60 days to appeal. The auditor requested the company to provide a list of customers that were terminated during our audit period, a copy of the termination letters, and the next three bills subsequent to the termination letters of each customer terminated. The company responded that no Florida customers had been terminated for ineligibility due to the fact that the company has not been in Florida for an entire year. The company's first verification of continued eligibility for Florida customers will be conducted in January of 2008.

LINE COUNT

Docket No. 080065-TX Exhibit IT-1 (Page 5 of 8) Audit Report

Objective: - To verify the line count and the amounts shown for each period on Forms FCC-497. To confirm that duplicate telephone numbers were not included in the subscriber listings, Fnor that the Carrier misclassified single-line businesses, multi-line business and residential for the period from June 1, 2006 - June 30, 2007.

Procedures: - Auditor recalculated the amounts shown on the Forms FCC-497. Auditor verified the phone numbers on the subscriber listings for LifeLine and LinkUp programs for duplicity. Audit Finding No. 3 discusses the fact that there are 1,092 duplicate phone numbers in the LinkUp program subscriber listing for the period from June 1, 2006 – June 30, 2007. Auditor obtained a document from the company stating that all subscribers are single line residential.

TOLL LIMITATION SERVICE

Objective: - To verify the reasonableness of the submitted incremental costs, along with the evidence that the choice to have toll limited service is actually being selected by the particular Low Income Consumer and is not being required by the Carrier. To verify that incremental costs do not include joint and common costs for the period from June 1, 2006 – June 30, 2007.

Procedures: - Auditor recalculated the incremental costs for toll limitation services reported on Forms FCC-497. Auditor tested the months of June 2006, July 2006, and May 2007. Auditor obtained the recurring and the non-recurring costs of the company's sole underlying carrier. The auditor confirmed with the company that the toll limitation service is being selected by the customer, and is not required by the Company.

1

SUBJECT: BOOKS AND RECORDS

STATEMENT OF FACT: Per FCC Rule 47 CFR 54.417 Recordkeeping requirements:

"Eligible telecommunications carriers must maintain records to document compliance with all Commission and state requirements governing the LifeLine/LinkUp programs for the three full preceding calendar years and provide that documentation to the Commission or Adminstrator upon request"

RECOMMENDATION: Audit staff requested detailed documentation to support the dollar amounts shown on FCC Form 499Q, and FCC Form 499A. Company responded "VCI cannot comply with this request. As is explained ..., data reported on FCC Forms 499Q and 499A are comprised of aggregate figures, including data from all states in which VCI provides service. Forms 499Q and 499A do not provide for the reporting of data on a state-by-state basis." FCC Form 499Q is filed quarterly and reports data (such as Interstate revenues and International revenues) in the aggregate for each reporting period. FCC-Form 499A reports revenues from all sources annually.

Audit staff requested detailed documentation to support the dollar amount shown on FCC Form 497. This is a monthly form reporting number of customers multiplied by tariff rates to obtain an amount to be reimbursed by the USAC. Company provided subscribers listings as support for number of customers reported and a general ledger as a support for the dollar amount. Auditor traced the revenue reported on this form to this general ledger provided for June 2006 and July 2006. Auditor was not able to reconcile the revenue reported on this form to this general ledger for August 2006 through June 2007. The auditor requested an explanation but did not receive one for the discrepancy between general ledger amounts and the amounts reported on the FCC Form 497.

Audit staff requested and was provided detailed documentation (invoices) to support the dollars spent on advertising for each of the LifeLine/LinkUp programs. Audit staff requested general ledger support for the amount of advertisement. The Company was unable to provide this because the records for advertisement costs per state are not kept.

Audit staff requested the company to provide support for the revenues reported on the Regulatory Assessment Fee return filed with this Commission for 2006. The Company did not provide documents to support the Regulatory Assessment Fee form filed with this Commission for 2006 and stated that "Revenues from customers for the year 2006 were correctly reported on the RAF."

SUBJECT: FILING WITH USAC AND FPSC

STATEMENT OF FACT: The Company was reimbursed by USAC in the amount of \$234,901 for LifeLine, LinkUp, and Toll Limitation Service for the period from June 1: 2006 December 31, 2006. The Regulatory Assessment Fee form filed with this Commission for the year 2006 reports revenue of \$64,449.

Rule 25-4.0161, Florida Administrative Code, requires each company to remit a fee based upon its gross operating revenue derived from intrastate business.

RECOMMENDATION: The auditor was not able to reconcile the amounts reported on the Forms FCC-497 to the amount of revenue reported on the 2006 annual RAF return. The company was not able to provide the documents to support the revenue on the RAF return. The company's response was that the revenue reported on the 2006 RAF annual return filed with Florida Public Service Commission was correct, and the amounts reported on Forms FCC-497 were reimbursements for LifeLine, LinkUp programs, and Toll Limitation Service costs.

•

SUBJECT: LINE COUNT

STATEMENT OF FACT: On the Forms FCC-497 filed with USAC, the company reported the following number of linkups each month. The USAC reimbursed VCI \$30 per each connection.

Month	Number of	Unit	Amount
	LinkUp	Reimbursement	Reimbursed
	Connections	by USAC	by USAC
October, 2006	233	\$30	\$6,990
December, 2006	1,198	\$30	35,940
April, 2007	1,345	\$30	40,350
May, 2007	1,095	\$30	32,850
June, 2007	951	\$30	28,530
Total	4,822		\$144,660

RECOMMENDATION: The audit staff reviewed the phone numbers reported on the subscribers listings for the LinkUp program. As shown on the chart below, the auditor found 546 duplicates, or instances where the phone number was repeated in the same month.

Month	Number of	Unit	Amount
	Duplicate LinkUp	Reimbursement	Reimbursed
	Connections	by USAC	by USAC
October, 2006	1	30	\$30
December, 2006	250	30	7,500
April, 2007	22	30	660
May, 2007	23	30	690
June, 2007	250	30	7,500
Total	546		\$16,380

DOCKET NO. 080065-TX: Investigation of Vilaire Communications, Inc.'s eligible telecommunications carrier status and competitive local exchange company certificate status in the State of Florida.

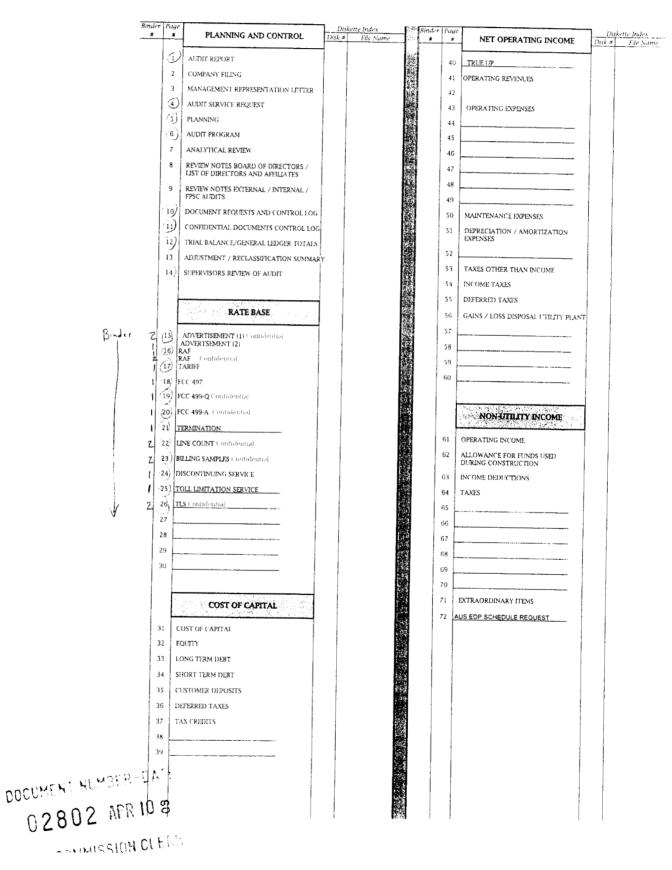
WITNESS: Direct Testimony Of Intesar Terkawi, Appearing On Behalf Of Staff

EXHIBIT IT-2: Non-Confidential Portion of Audit Work Papers

DOCUMENT NUMBER-DATE 02802 APR 10 8 FPSC-COMMISSION CLERK Vilaire Communications, Inc. (VCI) Control No. 07-250-1-2 Audit Period from June 1st, 2006 - June 30th, 2007 Docket No. 080065-TX Exhibit IT-2 (Page 1 of 128) Non-Confidential Portion of Audit Work Papers

21

WORKING PAPER STANDARD INDEX





Docket No. 080065-TX Exhibit IT-2 (Page 2 of 128) Non-Confidential Portion of Audit Work Papers

FLORIDA PUBLIC SERVICE COMMISSION

DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE BUREAU OF AUDITING

Tallahassee District Office

VILAIRE COMMUNICATIONS, INC. (VCI)

LOW INCOME BENEFICIARY AUDIT

THIRTEEN MONTH PERIOD ENDED JUNE 30, 2007

UNDOCKETED

AUDIT CONTROL NO. 07-250-1-2

I.Men Ferkami, Audit Manager

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M. Deamer, Audit Supervisor

Docket No. 080065-TX Exhibit IT-2 (Page 3 of 128) Non-Confidential Portion of Audit Work Papers

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DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE AUDITOR'S REPORT

November 5, 2007

Docket No. 080065-TX Exhibit IT-2 (Page 4 of 128) Non-Confidential Portion of Audit Work Papers

TO: FLORIDA PUBLIC SERVICE COMMISSION AND OTHER INTERESTED PARTIES

We have performed the procedures enumerated later in this report to meet the agreed upon objectives set forth by the Division of Competitive Markets and Enforcement in its audit service request. We have applied these procedures to the schedules prepared by Vilaire Communications, Inc. (VCI) in support of its filing for Reimbursement from the Universal Service Fund.

This audit is performed following general standards and field work standards found in the AICPA Statements on Standards for Attestation Engagements. This report is based on agreed upon procedures which are only for internal Commission use. There are confidential workpapers in this audit.

OBJECTIVES and PROCEDURES

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VERIFICATION OF FILING WITH USAC

Objective: - To determine if the amounts reported for reimbursement from the Universal Service Fund are supported by the Company's books and records for the period from June 1, 2006 – June 30, 2007.

18-18-12
Procedures: - Auditor recalculated the amounts on the Forms FCC 497 by multiplying the number of customers on the subscriber listings by the approved rate for the period from June 1, 2006 – June 30, 2007. Auditor reconciled the number of customers shown on the Forms FCC-497 to the number of customers on the subscriber listings for each month of the audit period.
5 - 3 Auditor reconciled the amounts on the Forms FCC-497 to the FPSC Order No. PSC-06-0436-PAA-TX, issued May 22, 2006. Auditor reconciled the rate on the thirteen months Forms FCC-497 to tariff. Audit Finding No. 2 discusses the problems of reconciling the Forms FCC-497 to the general ledger, to the Regulatory Assessment Fee form filed with this Commission for 2006, the FCC Forms 499-Q, and the FCC 499A.

ADVERTISEMENT

Objective: - To determine if the company advertised for the LifeLine and LinkUp programs, and to examine the advertisement for the different types of services and service rates it offers for the period from June 1, 2006 – June 30, 2007.



Procedures: - Auditor recalculated the amounts spent for advertisement for the LifeLine and LinkUp programs for the period from June 1, 2006 – June 30, 2007 from the invoices. Auditor obtained the text the company uses for advertisement. Auditor could not reconcile the amount of advertisement to the general ledger, as the company does not keep separate records of advertisement expenses per state. The company uses three TV stations to advertise for the LifeLine and LinkUp programs.

TERMINATION

Objective: - To determine if the company allowed the subscribers 60 days grace period following the date of impending termination letter to demonstrate continued eligibility as per Section 364.10 (2), Florida Statutes "An eligible telecommunication carrier shall allow a subscriber 60 days following the date of the pending termination letter to demonstrate continued eligibility".

21

21-1

Procedures: - Auditor obtained a document from the company stating that VCI would send a customer a separate letter from the monthly bill informing the customer of the termination, and give the customer 60 days to appeal. The auditor requested the company to provide a list of customers that were terminated during our audit period, a copy of the termination letters, and the next three bills subsequent to the termination letters of each customer terminated. The company responded that no Florida customers had been terminated for ineligibility due to the fact that the company has not been in Florida for an entire year. The company's first verification of continued

eligibility for Florida customers will be conducted in January of 2008.

LINE COUNT

Objective: - To verify the line count and the amounts shown for each period on Forms FCC-497. To confirm that duplicate telephone numbers were not included in the subscriber listings, nor that the Carrier misclassified single-line businesses, multi-line business and residential for the period from June 1, 2006 – June 30, 2007.

Procedures: - Auditor recalculated the amounts shown on the Forms FCC-497. Auditor verified the phone numbers on the subscriber listings for LifeLine and LinkUp programs for duplicity. Audit Finding No. 3 discusses the fact that there are 1,092 duplicate phone numbers in the LinkUp program subscriber listing for the period from June 1, 2006 – June 30, 2007. Auditor obtained a document from the company stating that all subscribers are single line residential.

TOLL LIMITATION SERVICE

Objective: - To verify the reasonableness of the submitted incremental costs, along with the evidence that the choice to have toll limited service is actually being selected by the particular Low Income Consumer and is not being required by the Carrier. To verify that incremental costs do not include joint and common costs for the period from June 1, 2006 – June 30, 2007.

Procedures: - Auditor recalculated the incremental costs for toll limitation services reported on Forms FCC-497. Auditor tested the months of June 2006, July 2006, and May 2007. Auditor obtained the recurring and the non-recurring costs of the company's sole underlying carrier. The auditor confirmed with the company that the toll limitation service is being selected by the customer, and is not required by the Company.

18 thru 18-12 26 thru 26-3

22

SUBJECT: **BOOKS AND RECORDS**

STATEMENT OF FACT: Per FCC Rule 47 CFR 54.417 Recordkeeping requirements:

"Eligible telecommunications carriers must maintain records to document compliance with all Commission and state requirements governing the LifeLine/LinkUp programs for the three full preceding calendar years and provide that documentation to the Commission or Adminstrator upon request"

RECOMMENDATION: Audit staff requested detailed documentation to support the dollar 19+6-M amounts shown on FCC Form 499Q, and FCC Form 499A. Company responded "VCI cannot 19-3 2 othru comply with this request. As is explained ..., data reported on FCC Forms 499O and 499A are comprised of aggregate figures, including data from all states in which VCI provides service. Forms 499Q and 499A do not provide for the reporting of data on a state-by-state basis." FCC Form 499Q is filed quarterly and reports data (such as Interstate revenues and International revenues) in the aggregate for each reporting period. FCC-Form 499A reports revenues from all 20-7 sources annually.

Audit staff requested detailed documentation to support the dollar amount shown on FCC Form 18thra 497. This is a monthly form reporting number of customers multiplied by tariff rates to obtain an 18-12 amount to be reimbursed by the USAC. Company provided subscribers listings as support for number of customers reported and a general ledger as a support for the dollar amount. Auditor traced the revenue reported on this form to this general ledger provided for June 2006 and July 12 2006. Auditor was not able to reconcile the revenue reported on this form to this general ledger for August 2006 through June 2007. The auditor requested an explanation but did not receive one for the discrepancy between general ledger amounts and the amounts reported on the FCC Form 497.

15-1 thru 15-44

16

Audit staff requested and was provided detailed documentation (invoices) to support the dollars spent on advertising for each of the LifeLine/LinkUp programs. Audit staff requested general ledger support for the amount of advertisement. The Company was unable to provide this because the records for advertisement costs per state are not kept.

Audit staff requested the company to provide support for the revenues reported on the Regulatory Assessment Fee return filed with this Commission for 2006. The Company did not provide documents to support the Regulatory Assessment Fee form filed with this Commission for 2006 11-2 and stated that "Revenues from customers for the year 2006 were correctly reported on the RAF."

16

SUBJECT: FILING WITH USAC AND FPSC

STATEMENT OF FACT: The Company was reimbursed by USAC in the amount of
 \$234,901 for LifeLine, LinkUp, and Toll Limitation Service for the period from June 1 2006 – December 31, 2006. The Regulatory Assessment Fee form filed with this Commission for the year 2006 reports revenue of \$64,449.

Rule 25-4.0161, Florida Administrative Code, requires each company to remit a fee based upon its gross operating revenue derived from intrastate business.

RECOMMENDATION: The auditor was not able to reconcile the amounts reported on the Forms FCC-497 to the amount of revenue reported on the 2006 annual RAF return. The company was not able to provide the documents to support the revenue on the RAF return. The company's response was that the revenue reported on the 2006 RAF annual return filed with Florida Public Service Commission was correct, and the amounts reported on Forms FCC-497 were reimbursements for LifeLine, LinkUp programs, and Toll Limitation Service costs.

- 5 -

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SUBJECT: LINE COUNT

	Month	Number of	Unit	Amount
		LinkUp	Reimbursement	Reimbursed
		Connections	by USAC	by USAC
18-4	October, 2006	233	\$30	\$6,990
18-6	December, 2006	1,198	\$30	35,940
18-10	April, 2007	1,345	\$30	40,350
18-11	May, 2007	1,095	\$30	32,850
18-12	June, 2007	951	\$30	28,530
i	Total	16,702		\$144,660

STATEMENT OF FACT: On the Forms FCC-497 filed with USAC, the company reported the following number of linkups each month. The USAC reimbursed VCI \$30 per each connection.

RECOMMENDATION: The audit staff reviewed the phone numbers reported on the subscribers listings for the LinkUp program. As shown on the chart below, the auditor found 1,092 duplicates, or instances where the phone number was repeated in the same month.

	Month	Number of	Unit	Amount
		Duplicate LinkUp	Reimbursement	Reimbursed
		Connections	by USAC	by USAC
22	October, 2006	1	30	\$30
	December, 2006	501	30	15,030
	April, 2007	44	30	1,320
22	May, 2007	45	30	1,350
e	June, 2007	501	30	15,030
-	Total	1,092		\$32,760

17 11/01

AUDIT SERVICE REQUEST

September 6, 2007 Date of Request 07-2-2-1 RCA control # Docket No. 080065-TX Exhibit IT-2 (Page 10 of 128) Non-Confidential Portion of Audit Work Papers

TO : DIVISION OF REGULATORY COMPLIANCE AND CONSUMER ASSISTANCE

FROM :Competitive Markets and EnforcementJohn Mann(850) 413-6976DivisionNamePhone Number

RE : REQUEST FOR AUDIT OF: Vilaire Communications, Inc. (VCI)

Undocketed - Low Income beneficiary audit of Vilaire Communications, Inc. (Carrier) for study areas in Florida for Low Income USAC Programs, including Lifeline (LL), LinkUp (LU), and Toll Limitation Services (TLS).

AUDIT PURPOSE:

The primary purpose of our audit is to determine whether the Carrier has submitted accurate underlying company data for the calculation of Universal Service support for the years 2006 and 2007.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 — From June 1st, 2006 - June 30th, 2007 Description Audion Sections of Reduces of Audion 1977

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LIST AUDIT OBJECTIVES & OTHER INFORMATION ON BACK.

ADMINISTRATIVE DETAILS:			
COMPANY CONTACT: Stan	Efferding	Secretary/Treasurer	
	Name	Title	Phone Number
MAIL ADDRESS: P. O. Box 9	8907 2228 8	South 78th Street	
		Street Address	
Tacoma	WA	9840)9-9050
City	St	ate	Zip Code
LOCATION OF RECORDS:	icoma	WA	
	City	State	
AUDIT DUE DATE: October 26	, 2007		
COORDINATING DETAILS:	(Name and Phone	e Number of other Division staff and a	any other administrative instructions)
Beth W. Salak, Director, Division	of CMP		850-413-6408
Dale N. Mailhot, Assistant Directo	r, CMP		850-413-6418
Richard A. Moses, Chief, CMP			850-413-6582
OURCE 008-R (12/05) 1 Vid 16 - 1	•		Ч

Robert J. Ca REFERENCI	sey, Public Itilities Supervisor, CMP 850-413-6974	
	(Attach copies of FPSC ORDERS and other documents as appropriate)	
	Docket No. 080065-TX Exhibit IT-2 (Page 11 of 128) Non-Confidential Portion of Audit Work F	Papers
Background Information:	To protect Universal Service funding, this audit involves certain verificat procedures regarding the Low Income universal service programs in Florida. T auditor will examine the financial and cost study records submitted to Univer Service Administrative Company (USAC), along with a review of the documentation supporting line count amounts. The intent of this review is determine that the Carrier has complied with the Low Income Mechanis requirements for the periods reviewed. The primary purpose of this audit is determine whether the Carrier has submitted accurate underlying company da for the calculation of Low Income support in both 2006 and 2007.	he sal the to sm to

ITEM #	AUDIT OBJECTIVE OR QUESTION (Add supplemental background for auditor)	
1	Eligibility verification:	
	Obtain and review the following documents for timely submission and	
	Completeness -	
1 .5	a. Eligible Telecommunications Carrier Designation Order (1) (see Attachment 1)	
	 b. State Certification Letters (2006-2007) c. Evidence of advertisement (2006-2007) 	
2	Verification of filings with USAC:	
Coelead	Perform a walk-through of the Carrier's USAC reporting procedures. Examine the	
2 See Lead 16, 18 \$ 19	Carrier's supporting documentation that was used to compile its filing for Universal Service reimbursement. Obtain copies of the following:	
16 17	FPSC: FPSC Annual RAF filings (Regulatory Assessment Fee) FPSC Tariffs	
	FCC:	
18	FCC Form 497, Low Income Quarterly Report (2) (see Attachment 2)	
19	FCC Form 499-Q, Telecommunications Reporting Worksheet (3)	
20	FCC Form 499-A, Telecommunications Reporting Worksheet (4)	

¹ Review Order PSC-06-0436-PAA-TX, issued May 22, 2006, to ensure that the Carrier was designated an ETC prior to receiving support. Also obtain and review the state and self certification letters for timeliness.

SOURCE

4-1

² This form, the Lifeline and Link –Up Worksheet, must be submitted to the Universal Service Administrative Company (USAC) by all eligible telecommunications carriers (ETCs) that request reimbursement for participating in the low-income program. The form must be submitted by the third Monday after the end of each quarter.

³ All telecommunications common carriers that expect to contribute more than \$10,000 to federal Universal Service Fund (USF) support mechanisms must file this quarterly form. The form contains revenue information from the prior quarter plus projections for the next quarter. Form 499-Q relates only to USF contributions. It does not relate to the cost recovery mechanisms for the Telecommunications Relay Service (TRS) Fund, the North American Numbering Plan Administration (NANPA), and the shared costs of local number portability (LNP).

1		· · · · · · · · · · · · · · · · · · ·	
14 A	USF Dat. Collection form		
NIP	USAC : Annual filings and correspondence	Docket No. 080065-TX Exhibit IT-2 (Page 12 of 128) Non-Confidential Portion of Audit Work Papers	
Ante	NECA: Annual filings		
3	Advertising		
15	Obtain evidence of advertising. Obtain and reviewed documentation that the Carrier has advertised its services that are supported by the federal universal service support mechanisms. Specifically, examine the advertisement for the different types of services and service rates it offers, including Lifeline and LinkUp. (5) If website, bill inserts, and telemarketing is used, determine effectiveness considering qualifying individuals unlikely to have a phone line.		
4	Termination		
21	According to §54.410(d), a Carrier must allow su date of the impending termination letter required i which to demonstrate continued eligibility. (5) Veri frame, and not some shorter time period.	n paragraph (c) of this section in	
5	Line Count		
22	For line count information (6), verify the amoun period. (7) Confirm that duplicate telephone nur		

4 This form must be filed by all contributors to the Universal Service Fund (USF) support mechanisms, the

Telecommunications Relay Service (TRS) Fund, the cost recovery mechanism for the North American Numbering Plan Administration (NANPA), and the shared costs of local number portability (LNP). Contributors include every

telecommunications carrier that provides interstate, intrastate, and international telecommunications, and certain other entities that provide interstate telecommunications for a fee.

5 54.405(b), Advertising § 54.405 Carrier obligation to offer Lifeline.

All eligible telecommunications carriers shall:

(a) Make available Lifeline service, as defined in \$54.401, to qualifying low-income consumers, and

(b) Publicize the availability of Lifeline service in a manner reasonably designed to reach those likely to qualify for the service.

(c) Notify Lifeline subscribers of impending termination of Lifeline service if the carrier has a reasonable basis to believe that the subscriber no longer meets the Lifeline-qualifying criteria, as described in \$54.409. Notification of impending termination shall be in the form of a letter separate from the subscriber's monthly bill. A carrier providing Lifeline service in a state that has dispute resolution procedures applicable to Lifeline termination, that requires, at a minimum, written notification of impending termination, must comply with the applicable state requirements.

(d) Allow subscribers 60 days following the date of the impending termination letter required in paragraph (c) of this section in which to demonstrate continued eligibility. Subscribers making such a demonstration must present proof of continued eligibility to the carrier consistent with applicable state or federal verification requirements, as described in §54.410(c). Carriers must terminate subscribers who fail to demonstrate continued eligibility within the 60-day time period. A carrier providing Lifeline service in a state that has dispute resolution procedures applicable to Lifeline termination must comply with the applicable state requirements.

[65 FR 47905, Aug. 4, 2000, as amended at 69 FR 34600, June 22, 2004]

6 47 CFR s. 54.802(a) "[e]ach Eligible Telecommunications Carrier...shall submit to the Administrator, on a quarterly basis...line count data showing the number of lines it serves...disaggregated by UNE Zone if UNE Zones have been established within that study area, showing residential/single-line business and multi-line business line counts separately." 7 47 C.F.R. § 54.802(a) "Each Eligible Telecommunications Carrier that is providing service within an area served by a price cap local exchange carrier shall submit to the Administrator, on a quarterly basis on the last business day of March, June, September, and December of each year line count data showing the number of lines it serves for the period ending three months prior to the reporting date."

Actions PSONGROER (12/05

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Exhibit IT-2 (Page 13 of 128) Non-Confidential Portion of Audit Work Papers

	subscribe sting (8), nor that the carrier misclass ad single-line business, multi-line
	business and residential. Obtain a detailed report produced by the Carrier's
	customer record and billing system. Test selected samples, by obtaining copies of
22	monthly bills, to verify that subscribers were active as of the line count date and that
	the telephone and account numbers on the subscriber listing agree to what was
	noted on the monthly bills. Also determine the review process that is used by the
	carrier to ensure that accurate amounts are reported for Low Income purposes.
6	Record Support
	For Lifeline (LL) and LinkUp (LU), obtain and examine financial and billing records
	to support the amounts reported to USAC for Lifeline and LinkUp reimbursement
1.7	(see Attachment 3). (9) Test selected samples, by obtaining copies of monthly bills,
I F	to verify that the Low Income subscribers were active as of the line count date. The
12	auditor will test and verify the amounts received for Lifeline, LinkUp and Toll Limiting
2-	Service (TLS). (10) The auditor should also obtain an explanation from the Carrier
	regarding the large difference in TLS support collected by VCI versus the amount
67	collected by Verizon, AT&T (formerly BellSouth) and Sprint (Embarq). (see
	Attachment 3) Test to make sure that VCI is not claiming Low Income support for
	resold lines, and then also receiving a credit for Low Income support from the
25-4	underlying carrier (i.e. VCI getting \$10 per Low Income customer using resold line
67	and then getting credit from the underlying carrier, for example AT&T, thereby
	receiving double recovery. (see Attachment 4) The auditor should also determine
223	the review process that is used by the carrier to ensure that accurate amounts are
21	reported for Low Income purposes. Obtain Carrier support for all amounts shown on
	Form 497. In addition, test the Carriers compliance with the Florida Administrative
	Code for Lifeline, especially the guidelines for termination of Lifeline service. (11)
wp	Record Retention
u l	Confirm that the Carrier has complied with record retention rules and can support all
22 \$ 2.3	underlying facts and figures reported for universal service purposes. (12)
8	Low Income Consumer Choice of Toll Limiting Service
175	Sec. 54.403 Lifeline support amount.
60	(c) Lifeline support for providing toll limitation shall equal the eligible
25 \$	telecommunications carrier's incremental cost of providing either toll blocking or toll
L_26_1	control, whichever is selected by the particular consumer. Verify the

 $\mathcal B$ The subscriber listing includes the customer name, address, telephone number, account number, subscription start date and disconnect date.

9.47 CFR 54.407(c) states that in order to receive universal service support reimbursement, the ETC must keep accurate records of the revenues it foregoes in providing Lifeline in conformity with 54.401.

10.47 CFR 54.411(a)(1) states that Link Up discounts provided are one-half of the customary charge, or 30, whichever is less.

11 25-4.0665 Lifeline Service.

(1) An eligible telecommunications carrier must provide 60 days written notice prior to the termination of Lifeline service. The notice of pending termination shall contain the telephone number at which the subscriber can obtain information about the subscriber's Lifeline service from the eligible telecommunications carrier. The notice shall also inform the subscriber of the availability, pursuant to Section 364.105, F.S., of discounted residential basic local telecommunications service.
(2) If a subscriber's Lifeline service is terminated and the subscriber subsequently presents proof of Lifeline eligibility, the eligible telecommunications carrier subscriber's as soon as practicable, but no later than 60 days following receipt of proof of eligibility. Irrespective of the date on which the eligible telecommunications carrier reinstates the subscriber's billed for Lifeline service as of the date the eligible telecommunications carrier reinstates the subscriber's billed for Lifeline service as of the date the eligible telecommunications carrier reinstates the subscriber's billed for Lifeline service as of the date the eligible telecommunications carrier reinstates the subscriber's billed for Lifeline service as of the date the eligible telecommunications carrier reinstates the subscriber's billed for Lifeline service as of the date the eligible telecommunications carrier received the proof of continued Lifeline eligibility. Specific Authority 350.127(2), 364.10(3)(j) F5. Law Implemented 364.01(4)(a), 364.10, 364.105 F5. History-New 1-2:07.
12 C.F.R. 47 § 54.417 (see Attachment 5) 1

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Docket No. 080065-TX Exhibit IT-2 (Page 14 of 128) Non-Confidential Portion of Audit Work Papers

	reasonal unless of the submitted incremental courts, along with evidence that the	
200	choice to have toll limited service is actually being selected by the particular Low	
60	Income consumer and is not being required by the Carrier. Form 497 must report	
1	incremental cost, not the retail value shown in the tariff. Note that incremental costs	
26	do not include joint and common costs, such as overhead and costs for services or	
	equipment used for non-toll limitation purposes.	
9	Commercial Agreement	
	To be granted ETC status, a Carrier must offer the services that are supported by	
	the Federal Universal Service Support Mechanisms using its own facilities and	
	resale of another carrier's services. An ETC cannot provide 100% of its services	
522	through resale and still be eligible for universal service support. Determine the	
_	number of VCI customers that are served either through VCI owned facilities or	
CD .	through network elements of another underlying Carrier. If VCI has a commercial	
	agreement with any other Carrier in Florida, obtain a copy of this agreement. Also	
CONFIDENC	determine the number of VCI customers that are served through resale of another	
	Carrier's services.	
10	Discontinued Service	
	It is understood that VCI has discontinued providing service in Oregon and	
.	Washington. (13) Obtain an explanation from the Carrier regarding this	
24	discontinuation of service, along with a detailed explanation of any	
1	review/investigation into the Low Income support received by the Carrier in these, or	
	any other, state.	
11	Internal Controls	
	Obtain a Carrier description of processes related to Low Income support,	
	specifically:	
	The application process for subscribers,	
0	How the subscriber becomes aware of Lifeline,	
5	How the Carrier becomes aware of subscribers (upon application, qualifying	
	agency notification, etc.)	
	• Procedures for determining ineligible customers (subscriber notification,	
1	random letters to verify, etc.)	
12	Tariff	
1 11	Obtain and review tariff to determine that the amounts reported on the Form 497	
	are accurate. Determine if tariff requires Lifeline re-certification each year. Verify	
a l	that Link-Up amounts claimed on Form 497 are one half of the connection charge	
No.	shown in tariff.	
5_[13]	Test compliance with Florida Statutes and Rules (See Attachment 6	
┛. ┈ -+		

¹³ VCI STOPS OFFERING LOCAL PHONE SERVICE

Tradital et PS& RHAROER (12/05)

Washington, D.C., December 12, 2006 (TheDigest.Com) - The following is an excerpt from a Public Notice posted by the Federal Communications Commission earlier today. A full copy of the text is located at

http://hraurfoxe.foc.goviedocs_public/attachmatch/DA-06-2483A1.doc. VCI was one of the few companies offering competitive local telephone service to residential customers in the states of Oregon and Washington. It mainly catered to "credit challenged" consumers and those using Universal Lifeline Service. This will give consumers in those states (yet) one less option for local telephone service. VCI also offers local telephone service in the states of Florida, Texas, lowa, Michigan, Minnesota, New Mexico and North and South Dakota. Their website is located at http://www.vcicompany.com. On December 4, 2006, VCI compuny (VCI or Applicant), located at 2228 5, 78th Street, Tacoma, Washington 98409-9050, filed an application with the Federal Communications Commission (FCC or Commission) requesting authority to the extent necessary, under section 214 of the Communications Act of 1934, as amended, 47 U.S.C. 9 214, and section 63.71 of the Commission's rules, 47 C.F.R. 9 63.71, to discontinue the provision of certain telecommunications services to customers located in the states of Oregon and Washington.

You replied on 10/26/2007 11:37 AM. Intesar Terkawi				
Cc: Subject: Attachmen	FW: ts:	Docket No. 080065-TX Exhibit IT-2 (Page 15 of 128) Non-Confidential Portion of Audit Work Papers		
Include this e	mail as part of workpaper 4 okay?			
Lynn				

From: Bob Casey Sent: Friday, October 26, 2007 10:18 AM To: John Mann; Lynn Deamer Subject: RE:

That's fine...thanks for the update!

From: John Mann Sent: Thu 10/25/2007 10:37 AM To: Lynn Deamer Cc: Bob Casey Subject: RE:

that is beyond fine with me.....

From: Lynn Deamer Sent: Thursday, October 25, 2007 9:13 AM To: John Mann Cc: Bob Casey Subject:

Hey John,

The Vilaire audit is due October 26, 2007. Intesar is not going to be able to make that date due to the initial week lag of start up because the company didn't want to respond and the company responses are running about a week late in the subsequent responses. Her target due date is November 15, 2007. Is this okay with you?

Vilaire Communications, Inc.

Phone Audit Control No. 07-250-1-2

From June 1st, 2006 - June 30th, 2007 Description EXtension & Duredate Life

Lynn M. Deamer Florida Public Service Commission Regulatory Analyst Supervisor Bureau of Auditing Ideamer@psc.state.fl.us Tel: 850.413.6416 Fax: 850.413.6417

Approval of the analyst 10 extension do r 10 115/07

11/15/07

11/07 1

Please Note: Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Therefore, your e-mail communication may be subject to public disclosure.

SOURCE As tinder

ittps://webmail.floridapsc.com/exchange/Intesar.Terkawi/Inbox/FW:.EML?Cmd=open

1-5 11/6/200⁻

Docket No. 080065-TX Exhibit IT-2 (Page 16 of 128) Non-Confidential Portion of Audit Work Papers

BEFORE THE PUBLIC SERVICE COMMISSION

In re: Petition for designation as eligibleDOCKET NO. 060144-TXtelecommunications carrier (ETC) by VilaireORDER NO. PSC-06-0436-PAA-TXCommunications, Inc.ISSUED: May 22, 2006

The following Commissioners participated in the disposition of this matter:

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description Control March 2007 LISA POLAK EDGAR, Chairman J. TERRY DEASON ISILIO ARRIAGA MATTHEW M. CARTER II KATRINA J. TEW

NOTICE OF PROPOSED AGENCY ACTION ORDER GRANTING PETITION FOR DESIGNATION AS ELIGIBLE TELECOMMUNICATIONS CARRIER

BY THE COMMISSION:

NOTICE is hereby given by the Florida Public Service Commission that the action discussed herein is preliminary in nature and will become final unless a person whose interests are substantially affected files a petition for a formal proceeding, pursuant to Rule 25-22.029, Florida Administrative Code.

I. Case Background

On February 17, 2006, Vilaire Communications, Inc. (Vilaire) petitioned this Commission for designation as an Eligible Telecommunications Carrier (ETC) in the State of Florida. Specifically, Vilaireis requesting that it be granted ETC status in 216 non-rural exchanges of BellSouth Telecommunications, Inc. (BellSouth). This is the fifth competitive local exchange carrier (CLEC) ETC petition to be brought before this Commission for consideration.¹

SOURCE As Inducated

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OCCUMENT NUMPER-DATE

FPSC-COMMISSION OF FRK

¹ By Order PSC-05-0324-PAA-TX, issued March 21, 2005, Docket No. 041302-TX, In Re: Petition for Designation as Eligible Telecommunications Carrier by Knology of Florida, Inc., the Commission granted Knology of Florida, Inc. (Knology) Eligible Telecommunications Carrier status. Knology is a certificated CLEC which provides telecom service over its broadband network. By Order PSC-05-1255-PAA-TX, issued December 27, 2005, Docket No. 050483 TX, In Re: Petition for designation as Eligible Telecommunications Carrier by Budget Phone, Inc., the Commission granted Budget Phone ETC status in the requested Verizon and BellSouth wire centers, and approved ETC status in non-rural areas of Sprint provided Budget Phone consummates an agreement with Sprint. American Dial Tone (Docket No. 050542-TX) and Nexus (Docket No. 050889-TX), the third and fourth ETC recommendations, were considered by the Commission and approved at the April 4, 2006 agenda.

ORDER NO. PSC-06-0436-PAA-T. Vilaire Communications, Inc. DOCKET NO. 060144-TX PAGE 2

Control No. 07-250-1-2 Phone Audit From June 1st, 2006 - June 30th, 2007 Description

Vilaire is a FPSC-certificated CLEC which provides local exchange service in BellSouth's service area. Vilaire has indicated that it has the ability to provide services utilizing a combination of facilities obtained through a commercial facilities agreement (CFA) and resale services provided by BellSouth. Upon designation as an ETC, Vilaire indicates that it will participate in and offer Lifeline and Link-Up programs to qualified low income consumers. Additionally, Vilaire has committed to publicize the availability of Lifeline and Link-Up services in a manner reasonably designed to reach those likely to qualify for those services.²

Vilaire is headquartered in Lakewood, Washington and is authorized to conduct business as a foreign corporation in the State of Florida. Vilaire provides service to approximately 50,000 low-income residential customers and is authorized to provide local exchange services in the states of California, Colorado, Florida, Idaho, Iowa, Kentucky, Michigan, Minnesota, Montana, Nebraska, New Mexico, Nevada, North Carolina, North Dakota, Oregon, South Dakota, Texas, Utah, Wisconsin, Wyoming and Washington. To date, Vilaire has been granted ETC status in all of the above states except Florida, Kentucky, Montana, North Carolina, Nevada and Wisconsin. Vilaire indicates that its accounts with the Federal Communications Commission (FCC) and Universal Service Administrative Company are current. Vilaire is not aware of any outstanding complaints or violations from the FCC.

Vilaire has stated that it is not planning to seek high-cost universal service funding if it is designated as an ETC in Florida. Since Vilaire is not seeking any high cost universal service funding, and its purpose in requesting ETC status in Florida is to provide Lifeline and Link-Up service, we find no harm in granting ETC status to Vilaire. It would have little, if any, effect on the size of the universal service fund³, and it would enhance the availability of Lifeline and Link-Up services in Florida.

We have authority under Section 364.10(2), Florida Statutes, to decide a petition by a CLEC seeking designation as an eligible telecommunications carrier pursuant to 47 C.F.R. s. 54.201.

II. Analysis

Federal Communications Commission (FCC) rules provide that carriers designated as ETCs shall, throughout the designated service area: (1) offer the services that are supported by federal universal support mechanisms either using their own facilities or a combination of their own facilities and the resale of another carrier's services and, (2) advertise the availability of such services and the related charges therefore using media of general distribution. See CFR §54.201(d).

SOURCE And Address

² See 47 C.F.R. §§ 54.401-54.417 – Universal Service Support for Low Income-Consumers

³ See FCC 05-46 (¶54) - Federal-State Joint Board on Universal Service - Impact on the Fund. "As the Commission has found in the past, analyzing the impact of one ETC on the overall fund may be inconclusive. Indeed, given the size of the total high-cost fund — approximately \$3.8 billion a year — it is unlikely that any individual ETC designation would have a substantial impact on the overall size of the fund."

ORDER NO. PSC-06-0436-PAA-TX DOCKET NO. 060144-TX PAGE 3 Vilaire Communications, II. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

Vilaire has identified a total of 216 BellSouth wire centers in which it wishes to offer the services that are supported by federal universal service support mechanisms.

ETC Certification Requirements

Docket No. 080065-TX Exhibit IT-2 (Page 18 of 128) Non-Confidential Portion of Audit Work Paper

CFR Rule 54.201(c), addresses a state commission's responsibilities related to ETC designation, stating:

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 (d) of this section. 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.

To qualify as an ETC, telecommunications carriers must provide nine services identified in CFR Rule 54.201(d)(1).

- (1) <u>Voice grade access to the public switched network</u> 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;
- (2) <u>Local Usage</u> Local usage indicates the amount of minutes of use of exchange service, provided free of charge to end users;
- (3) <u>Dual tone multi-frequency signaling or its functional equivalent</u> Dual tone multifrequency ("DTMF") is a method of signaling that facilitates the transportation of signaling through the network, thus shortening call set-up time;
- (4) <u>Single-party service or its functional equivalent</u> 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;
- (5) <u>Access to emergency services</u> Access to emergency services includes access to services, such as 911 and enhanced 911, provided by local governments or other public safety organizations;

SOURCE As Inducated 3

5-2

ORDER NO. PSC-06-0436-PAA-TX DOCKET NO. 060144-TX PAGE 4

Vilaire Communications. Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

- (6) 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 and/or completion, of a telephone call;
- (7) 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;
- (8) 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; and
- (9) <u>Toll limitation for qualifying low-income consumers</u> Toll limitation or Blocking restricts all direct dial toll access.

In addition to providing the above services, ETC's must advertise the availability of such services and the associated charges using media of general distribution.

III. Decision

We have authority under Section 364.10(2), Florida Statutes, to decide a petition by a CLEC seeking designation as an eligible telecommunications carrier pursuant to 47 C.F.R. s. 54.201. Vilaire is a CLEC that offers local exchange service and meets the statutory facilities requirement of universal service by leasing the physical components of the telecommunications network necessary to provide the nine services identified in CFR Rule 54.201(d)(1) through its CFA with BellSouth.

Vilaire has acknowledged the requirements of the Florida Lifeline program and has ficancile agreed to adhere to the program which provides qualified customers a total of \$13.50 in Lifeline assistance credits consisting of: \$6.50 in federal subscriber line charges, \$1.75 in federal support assistance creats consisting of: \$6.50 in federal subscriber line charges, \$1.75 in federal support for for states that have approved the credit, and \$1.75 which is a 50% match of federal support for $\int c c r g g g$, having a state lifeline program requiring a \$3.50 credit under the Florida eligibility criteria. and 5 th Vilaire indicates that it will provide the \$3.50 credit to qualified clients, advertise the availability Samples f of Lifeline, and begin offering these services within 180 days/6 months of receiving ETC status. The Subscribe

't forms wp 23

Vilaire has indicated that it will abide by all Florida Statutes, Rules, and Commission bills-see Orders regarding ETCs. Since Vilaire is not seeking any high cost universal service funding and its purpose in requesting ETC status in Florida is to provide Lifeline and Link-Up service, we find no harm in granting ETC status to Vilaire. Providing Lifeline and Link-up service, which facilitates the availability of basic phone service to Florida's low-income customers, could have a positive effect on Lifeline participation rates. Therefore, we find that Vilaire be granted ETC status in the BellSouth non-rural wire centers identified in Attachment A.

Based on the foregoing, it is

SOURCE A. Turchenter

ORDER NO. PSC-06-0436-PAA-TX DOCKET NO. 060144-TX PAGE 5 Docket No. 080065-TX Exhibit IT-2 (Page 20 of 128) Non-Confidential Portion of Audit Work Papers

ORDERED by the Florida Public Service Commission that Villaire Communications, Inc.'s Petition for designation as an Eligible Telecommunications Carrier (ETC) in the State of Florida for the BellSouth non-rural wire centers identified in Attachment A be granted. It is further

ORDERED that the provisions of this Order, issued as proposed agency action, shall become final and effective upon the issuance of a Consummating Order unless an appropriate petition, in the form provided by Rule 28-106.201, Florida Administrative Code, is received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on the date set forth in the "Notice of Further Proceedings" attached hereto. It is further

ORDERED that in the event this Order becomes final, this docket shall be closed.

By ORDER of the Florida Public Service Commission this 22nd day of May, 2006.

S. BAYÓ, Director

Division of the Commission Clerk and Administrative Services

(SEAL)

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description Order, Machine Audit

TLT

NOTICE OF FURTHER PROCEEDINGS OR JUDICIAL REVIEW

The Florida Public Service Commission is required by Section 120.569(1), Florida Statutes, to notify parties of any administrative hearing that is available under Section 120.57, Florida Statutes, as well as the procedures and time limits that apply. This notice should not be construed to mean all requests for an administrative hearing will be granted or result in the relief sought.

Mediation may be available on a case-by-case basis. If mediation is conducted, it does not affect a substantially interested person's right to a hearing.

The action proposed herein is preliminary in nature. Any person whose substantial interests are affected by the action proposed by this order may file a petition for a formal

SOURCE As Indicated

5-4

ORDER NO. PSC-06-0450-PAA-TX DOCKET NO. 060144-TX PAGE 6 Docket No. 080065-TX Exhibit IT-2 (Page 21 of 128) Non-Confidential Portion of Audit Work Papers

proceeding, in the form provided by Rule 28-106.201, Florida Administrative Code. This petition must be received by the Director, Division of the Commission Clerk and Administrative Services, 2540 Shumard Oak Boulevard, Tallahassee, Florida 32399-0850, by the close of business on June 12, 2006.

In the absence of such a petition, this order shall become final and effective upon the issuance of a Consummating Order.

Any objection or protest filed in this/these docket(s) before the issuance date of this order is considered abandoned unless it satisfies the foregoing conditions and is renewed within the specified protest period.

> Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description Descripti

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Vilaire Communications, Inc. P. Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

Docket No. 080065-TX Exhibit IT-2 (Page 22 of 128) Non-Confidential Portion of Audit Work Papers

(6) The requested Extended Area Service shall be approved and ordered by the Commission upon a finding that: a majority of all respondents in each exchange if route-by-route, or the consolidated results if so ordered, required to be surveyed vote favorably, and at least (40%) percent of all ballots sent are returned.

(7) If the vote is ordered to be route-by-route, the subscriber survey material shall state separately for each exchange to be surveyed the amount of local service rate increases.

Specific Authority 350.127 FS. Law Implemented 364.03, 364.385(2) FS. History-New 4-14-81, Formerly 25-4.63, Amended 10-5-92.

25-4.064 Alternatives to Non-Optional Extended Area Service.

Whenever interexchange traffic patterns are such that subscriber needs may be adequately served by alternative service offerings, or requests may not fully meet the requirements of these rules but higher than average interexchange calling may exist, the Commission may give consideration to other alternatives such as one-way Optional Calling Plans, interexchange message rate service, Usage Sensitive Pricing options, discounted toll offering, etc.

Specific Authority 350.127(2) FS. Law Implemented 364.03, 364.14, 364.385(2) FS. History-New 4-14-81, Formerly 25-4.64, Amended 10-5-92.

PART V GENERAL SERVICE PROVISIONS

25-4.066 Availability of Service.

(1) Each telecommunications company shall provide central office equipment and outside plant facilities designed and engineered in accordance with realistic anticipated customer demands for basic local telecommunications service within its certificated area in accordance with its filed tariffs or orders of the Commission, subject to its ability to secure and provide, for reasonable expense, suitable facilities and rights for construction and maintenance of such facilities.

(2) Where central office and outside plant facilities are readily available, at least 90 percent of all requests for primary service in any calendar month shall normally be satisfied in each exchange of at least 50,00 lines and quarterly in exchanges of less than 50,000 lines within an interval of three working days after receipt of application when all tariff requirements relating thereto have been complied with, except those instances where a later installation date is requested by the applicant or where special equipment or services are involved.

(3) If the applicant requests an installation date beyond three working days, the requested date shall be counted as day three for measurement purposes.

(4) When an appointment is made in order for the company to gain access to the customer's premises, the mutually agreed upon date will be day three for measurement purposes. Failure of the customer to be present to afford the company representative entry to the premises during the appointment period shall exempt the order for measurement purposes. Whenever a company representative is unable to gain admittance to a customer's premises during the scheduled appointment period, the company representative shall leave a notice, stating the name of the company representative and the date and time the company representative was at the premises.

(5) Each telecommunications company shall establish as its objective the satisfaction of at least 95 percent of all applications for new service in each exchange within a 30 day maximum interval and, further, shall have as its objective the capability of furnishing service within each of its exchanges to applicants within 60 days after date of application; except those instances where a later installation date is requested by the applicant or where special equipment or services are involved.

(6) Whenever, for any reason, the service installation cannot be made at the time requested by the applicant or within the prescribed interval, the applicant shall be notified promptly of the delay and the reason therefor.

(7) Where facility additions are required to make service available, the applicant shall be further advised as to the circumstances and conditions under which service will be provided and as soon as practicable an estimated date when service will be furnished. With respect to applications aged over six months all service dates that result in a further delay due to the company's inability to meet the original estimated date of service shall be identified in the appropriate section of the report of held applications filed with the Commission and shall include an explanation of the reasons therefor.

(8) Each company shall report pursuant to Rule 25-4.0185, F.A.C. Periodic Reports, the performance of the company with respect to the availability of service requirements as outlined in Form PSC/CMP 28 (4/05), incorporated into Rule 25-4.0185, F.A.C., by reference and available from the Division of Competitive Markets and Enforcement. Each company shall explain the reasons for all service orders that are not completed within 30 calendar days.

Specific Authority 350.127(2) FS. Law Implemented 364.025, 364.03, 364.14, 364.15, 364.183, 364.185 FS. History-Revised 12-1-68, Amended 3-31-76, Formerly 25-4.66, Amended 3-10-96, 4-3-05, 4-3-05.

25-4.067 Extension of Facilities - Contributions in Aid of Construction.

(1) Each telecommunications company shall make reasonable extensions to its lines and service and shall include in its tariffs filed with the Commission a statement of its standard extension policy setting forth the terms and conditions under which its facilities will be extended to serve applicants for service within its certificated area.

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Docket No. 080065-TX Exhibit IT-2 (Page 23 of 128) Non-Confidential Portion of Audit Work Papers

1.1

Attachment 6 Florida Statute/Rules For Lifeline Vilaire Communications, Inc. Non-Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

364.0252 Expansion of consumer information programs; customer assistance; rulemaking authority.--The Florida Public Service Commission shall expand its current consumer information program to inform consumers of their rights as customers of competitive telecommunications services and shall assist customers in resolving any billing and service disputes that customers are unable to resolve directly with the company. The commission may, pursuant to this program, require all telecommunications companies providing local or long distance telecommunications services to develop and provide information to customers. The commission may specify by rule the types of information to be developed and the manner by which the information will be provided to the customers. The Florida Public Service Commission shall undertake a comprehensive and ongoing effort to inform consumers regarding how to protect themselves in a competitive telecommunications market. <u>Of specific concern are informing consumers</u> <u>concerning the availability of the lifeline and Link-Up Programs for low-income</u> <u>households and alerting consumers to how they can avoid having their service changed</u> <u>or unauthorized charges added to their telephone bills.</u>

History.--s. 6, ch. 98-277; s. 3, ch. 99-354.

364.10 Undue advantage to person or locality prohibited; lifeline service.--

(1) A telecommunications company may not make or give any undue or unreasonable preference or advantage to any person or locality or subject any particular person or locality to any undue or unreasonable prejudice or disadvantage in any respect whatsoever.

(2)(a) The prohibitions of subsection (1) notwithstanding, an eligible telecommunications carrier shall provide a lifeline Assistance Plan to qualified residential subscribers, as defined in a commission-approved tariff or price list, and a preferential rate to eligible facilities as provided for in part II. For the purposes of this section, the term "eligible telecommunications carrier" means a telecommunications company, as defined by s. <u>364.02</u>, which is designated as an eligible telecommunications carrier by the commission pursuant to 47 C.F.R. s. 54.201.

(b) An eligible telecommunications carrier shall offer a consumer who applies for or receives lifeline service the <u>option of blocking all toll calls</u> or, if technically capable, placing a limit on the number of toll calls a consumer can make. The eligible telecommunications carrier may not charge the consumer an administrative charge or other additional fee for blocking the service.

(c) An eligible telecommunications carrier <u>may not collect a service deposit</u> in order to initiate lifeline service if the qualifying low-income consumer voluntarily elects toll blocking or toll limitation. If the qualifying low-income consumer elects not to place toll blocking on the line, an eligible telecommunications carrier may charge a service deposit.

(d) An eligible telecommunications carrier <u>may not charge lifeline subscribers a monthly</u> <u>number-portability charge</u>.

(e)1. An eligible telecommunications carrier must <u>notify a lifeline subscriber of impending</u> <u>termination of lifeline service</u> if the company has a reasonable basis for believing that the subscriber no longer qualifies. Notification of pending termination must be in the form of a letter that is separate from the subscriber's bill.

2. <u>An eligible telecommunications carrier shall allow a subscriber 60 days following the</u> date of the pending termination letter to demonstrate continued eligibility. The subscriber



must present proof of communed eligibility. An eligible telecommune subscriber off of lifeline service, pursuant to its tariff, if the subscribe Non-Confidential Portion of Audit Work Papers continued eligibility.

3. The commission shall establish procedures for such notification and termination.

(f) An eligible telecommunications carrier shall <u>timely credit a consumer's bill with the lifeline</u> <u>Assistance credit as soon as practicable, but no later than 60 days following receipt of</u> <u>notice of eligibility from the Office of Public Counsel or proof of eligibility from the</u> <u>consumer</u>.

(3)(a) Effective September 1, 2003, any local exchange telecommunications company authorized by the commission to reduce its switched network access rate pursuant to ¹s. 364,164 shall have tariffed and shall provide lifeline service to any otherwise eligible customer or potential customer who meets an income eligibility test at 135 percent or less of the federal poverty income guidelines for lifeline customers. Such a test for eligibility must augment, rather than replace, the eligibility standards established by federal law and based on participation in certain low-income assistance programs. Each intrastate interexchange telecommunications company shall, effective September 1, 2003, file a tariff providing at a minimum the intrastate interexchange telecommunications carrier's current lifeline benefits and exemptions to lifeline customers who meet the income eligibility test set forth in this subsection. The Office of Public Counsel shall certify and maintain claims submitted by a customer for eligibility under the income test authorized by this subsection.

(b) Each eligible telecommunications carrier subject to this subsection shall provide to each state and federal agency providing benefits to persons eligible for <u>lifeline service applications</u>, <u>brochures</u>, <u>pamphlets</u>, <u>or other materials that inform the persons of their eligibility for</u> <u>lifeline</u>, and each state agency providing the benefits shall furnish the materials to affected persons at the time they apply for benefits.

(c) Any local exchange telecommunications company customer receiving lifeline benefits <u>shall not</u> <u>be subject to any residential basic local telecommunications service rate increases</u> authorized by ¹s. <u>364.164</u> until the local exchange telecommunications company reaches parity as defined in ¹s. <u>364.164</u>(5) or until the customer no longer qualifies for the lifeline benefits established by this section or s. <u>364.105</u>, or unless otherwise determined by the commission upon petition by a local exchange telecommunications company.

(d) An eligible telecommunications carrier <u>may not discontinue basic local exchange</u> <u>telephone service</u> to a subscriber who receives lifeline service because of nonpayment by the subscriber of charges for nonbasic services billed by the telecommunications company, including long-distance service. A subscriber who receives lifeline service shall be required to pay all applicable basic local exchange service fees, including the subscriber line charge, E-911, telephone relay system charges, and applicable state and federal taxes.

(e) An eligible telecommunications carrier may not refuse to connect, reconnect, or provide lifeline service because of unpaid toll charges or nonbasic charges other than basic local exchange service.

(f) An eligible telecommunications carrier may require that payment arrangements be made for outstanding debt associated with basic local exchange service, subscriber line charges, E-911, telephone relay system charges, and applicable state and federal taxes.

(g) An eligible telecommunications carrier may block a lifeline service subscriber's access to all long-distance service, except for toll-free numbers, and may block the ability to accept collect calls when the subscriber owes an outstanding amount for long-distance service or amounts resulting from collect calls. However, the <u>eligible telecommunications carrier may not impose a charge</u> <u>for blocking long-distance service</u>. The eligible telecommunications carrier shall remove the block at the request of the subscriber without additional cost to the subscriber upon payment of the outstanding amount. An eligible telecommunications carrier may charge a service deposit before removing the block.

SOURCE Florida Statute/Pula Alteria PSC/RCA 008-R (12/05)



Docket No. 080065-TX (h)1. By December 31, 2007, each state agency that provides beinc Exhibit IT-2 (Page 25 of 128) lifeline service shall undertake, in cooperation with the Department Non-Confidential Portion of Audit Work Papers Services, the Department of Education, the commission, the Office of a unit community in telecommunications companies providing lifeline services, the development of procedures to promote lifeline participation.

2. If any state agency determines that a person is eligible for lifeline services, the agency shall immediately forward the information to the commission to ensure that the person is automatically enrolled in the program with the appropriate eligible telecommunications carrier. The state agency shall include an option for an eligible customer to choose not to subscribe to the lifeline service. The Public Service Commission and the Department of Children and Family Services shall, no later than December 31, 2007, adopt rules creating procedures to automatically enroll eligible customers in lifeline service.

3. The commission, the Department of Children and Family Services, and the Office of Public Counsel shall enter into a memorandum of understanding establishing the respective duties of the commission, the department, and the public counsel with respect to the automatic enrollment. procedures no later than December 31, 2007.

(i) The commission shall report to the Governor, the President of the Senate, and the Speaker of the House of Representatives by December 31 each year on the number of customers who are subscribing to lifeline service and the effectiveness of any procedures to promote participation.

(j) The commission shall adopt rules to administer this section.

History.--s. 10, ch. 6525, 1913; RGS 4402; CGL 6366; s. 3, ch. 76-168; s. 1, ch. 77-457; ss. 12, 32, ch. 80-36; s. 2, ch. 81-318; ss. 6, 7, ch. 89-163; ss. 17, 48, 49, ch. 90-244; s. 4, ch. 91-429; s. 13, ch. 95-403; s. 10, ch. 2003-32; s. 16, ch. 2005-132; s. 11, ch. 2007-29.

¹Note.--Repealed by s. 14, ch. 2007-29.

364.105 Discounted rate for basic service for former lifeline subscribers.--Each local exchange telecommunications company shall offer discounted residential basic local telecommunications service at 70 percent of the residential local telecommunications service rate for any lifeline subscriber who no longer qualifies for lifeline. A lifeline subscriber who requests such service shall receive the discounted price for a period of 1 year after the date the subscriber ceases to be qualified for lifeline. In no event shall this

preclude the offering of any other discounted services which comply with ss. 364.08, 364.09, and 364.10.

History. s. 3, ch. 98-277.	Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description florida glands/Hansa gamma and the fill
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¹364.107 Public records exemption; lifeline Assistance Plan participants.--

(1) Personal identifying information of a participant in a telecommunications carrier's lifeline Assistance Plan under s. 364.10 held by the Public Service Commission is confidential and exempt from s. <u>119.07(1)</u> and s. 24(a), Art. I of the State Constitution.

(2) Information made confidential and exempt under subsection (1) may be released to the applicable telecommunications carrier for purposes directly connected with eligibility for, verification related to, or auditing of a lifeline Assistance Plan.

(3)(a) An officer or employee of a telecommunications carrier shall not intentionally disclose information made confidential and exempt under subsection (1), except as:

1. Authorized by the customer:

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2. Necessary for billing purposes;

3. Required by subpoena, court order, or other process of court;

4. Necessary to disclose to an agency as defined in s. <u>[19,0]1</u> or a governmental entity for purposes directly connected with implementing service for, or verifying eligibility of, a part impart in a lifeline Assistance Plan or auditing a lifeline Assistance Plan; or

5. Otherwise authorized by law.

(b) Nothing in this section precludes a telecommunications carrier from disclosing information made confidential and exempt under subsection (1) to the extent such information is otherwise publicly available or from disclosing to a customer his or her own account record through telephonic means.

(c) Any officer or employee of a telecommunications carrier who intentionally discloses information in violation of paragraph (a) commits a misdemeanor of the second degree, punishable as provided in s. 775.082 or s. 775.083.

(4) This section is subject to the Open Government Sunset Review Act in accordance with s. 119.15 and shall stand repealed on October 2, 2012, unless reviewed and saved from repeal through reenactment by the Legislature.

History.--s. 1, ch. 2007-247.

¹Note.--Section 2, ch. 2007-247, provides that "[t]he Legislature finds that it is a public necessity that personal identifying information of a participant in a telecommunications carrier's lifeline Assistance Plan under s. 364.10, Florida Statutes, held by the

Public Service Commission be made confidential and exempt from s. 119.07(1), Florida Statutes, and s. 24(a), Art. I of the State Constitution. The lifeline Assistance Plan provides assistance to qualified low-income households by providing a credit on their local telephone bill. Allowing qualified low-income households to receive this credit permits them to maintain local telephone service. Participation in lifeline Assistance Plans has remained at approximately 12 percent of eligible Florida households despite extensive efforts to make eligible citizens aware of the plan. Protecting the personal identifying information of participants in a lifeline Assistance Plan will encourage qualified citizens to apply for the credit offered under the plan. The Public Service Commission must be able to maintain the confidentiality of that information because disclosure could create a chilling effect on participation. There is a strong likelihood that participants might choose not to avail themselves of the plan because the information submitted would identify them as qualified recipients of low-income program benefits. Finally, without the exemption, the effective and efficient administration of a government program would be hindered."

364.604 Billing practices.--

(1) Each billing party must clearly identify on its bill the name and toll-free number of the originating party; the telecommunications service or information service billed; and the specific charges, taxes, and fees associated with each telecommunications or information service. The originating party is responsible for providing the billing party with all required information. The toll-free number of the originating party or its agent must be answered by a customer service representative or a voice response unit. If the customer reaches a voice response unit, the originating party or its agent must initiate a response to a customer inquiry within 24 hours, excluding weekends and holidays.

(2) A customer shall not be liable for any charges for telecommunications or information services that the customer did not order or that were not provided to the customer.

(3) Every billing party shall provide a free blocking option to a customer to block 900 or 976 telephone calls.

(4) <u>A billing party shall not disconnect a customer's lifeline local service if the charges,</u> taxes, and fees applicable to basic local exchange telecommunications service are paid.

(5) Pursuant to s. 120.536, the commission may adopt rules to implement this section.

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Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

§54.413

§54.413 Reimbursement for revenue forgone in offering a Link Up program.

(a) Eligible telecommunications car riers may receive universal service support reimbursement for the revenue they forgo in reducing their customary charge for commencing telecommunications service and for providing a deferred schedule for payment of the charges assessed for commencing service for which the consumer does not pay interest, in conformity with §54.411.

(b) In order to receive universal service support reimbursement for providing Link Up, eligible telecommunications carriers must keep accurate records of the revenues they forgo in reducing their customary charge for commencing telecommunications service and for providing a deferred schedule for payment of the charges assessed for commencing service for which the consumer does not pay interest, in conformity with §54.411. Such records shall be kept in the form directed by the Administrator and provided to the Administrator at intervals as directed by the Administrator or as provided in this subpart. The forgone revenues for which the eligible telecommunications carrier may receive reimbursement shall include only the difference between the carrier's customary connection or interest charges and the charges actually assessed to the participating low-income consumer.

§54.415 Consumer qualification for Link Up.

(a) In a state that mandates state Lifeline support, the consumer qualification criteria for Link Up shall be the same as the criteria that the state established for Lifeline qualification in accord with \$54.409(a).

(b) In a state that does not mandate state Lifeline support, the consumer qualification criteria for Link Up shall be the criteria set forth in \$54.409(b).

(c) Notwithstanding paragraphs (a) and (b) of this section, an eligible resident of Tribal lands, as defined in §54.400(e), shall qualify to receive Link Up support.

[65 FR 47906, Aug. 4, 2000]

SOURCE (ederal de

47 CFR Ch. I (10-1-05 Edition)

§54.416 Certification of consumer Qualification for Link Up.

Consumers qualifying under an income-based criterion must present documentation of their household incomeprior to enrollment in Link Up consistent with requirements set forth in \$54.410(a) and (b).

[69 FR 34601, June 22, 2004]

EFFECTIVE DATE NOTE: At 69 FR 34601, June 22, 2004, §54.416 was added. This section contains information collection and record keeping requirements and will not become effective until approval has been given by the Office of Management and Budget.

§54.417 Recordkeeping requirements.

(a) Eligible telecommunications carriers must maintain records to document compliance with all Commission and state requirements governing the Lifeline/Link Up programs for the three full preceding calendar years and provide that documentation to the Commission or Administrator upon request.

Notwithstanding the preceding sentence, eligible telecommunications carriers must maintain the documentation required in §§54.409(d) and 54.410(b)(3) for as long as the consumer receives Lifeline service from that eligible telecommunications carrier or until audited by the Administrator. If an eligible telecommunications carrier provides Lifeline discounted wholesale services to a reseller, it must obtain a certification from that reseller that it is complying with all Commission requirements governing the Lifeline/Link Up programs.

(b) Non-eligible-telecommunicationscarrier resellers that purchase Lifeline discounted wholesale services to offer discounted services to low-income consumers must maintain records to document compliance with all Commission requirements governing the Lifeline/ Link Up programs for the three full preceding calendar years and provide that documentation to the Commission or Administrator upon request. To the extent such a reseller provides discounted services to low-income consumers, it constitutes the eligible telecommunications carrier referenced in Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

Federal Communications Commission

\$54.405(c). 54.405(d). 54.409(d), 54.410, and 54.416.

[69 FR 34601, June 22, 2004]

EFFECTIVE DATE NOTE: At 69 FR 34601, June-22, 2004, §54.417 was added. This section contains information collection and recordkeeping requirements and will not become effective until approval has been given by the Office of Management and Budget.

Subpart F—Universal Service Support for Schools and Libraries

§54.500 Terms and definitions.

(a) Billed entity. A "billed entity" is the entity that remits payment to service providers for services rendered to eligible schools and libraries.

(b) Educational purposes. For purposes of this subpart, activities that are integral, immediate, and proximate to the education of students, or in the case of libraries, integral, immediate and proximate to the provision of library services to library patrons, qualify as "educational purposes." Activities that occur on library or school property are presumed to be integral, immediate, and proximate to the education of students or the provision of library services to library patrons.

(c) Elementary school. An "elementary school" is a non-profit institutional day or residential school, including a public elementary charter school, that provides elementary education, as determined under state law.

(d) Library. A "library" includes:

(1) A public library;

(2) A public elementary school or secondary school library;

(3) An academic library:

(4) A research library, which for the purpose of this section means a library that:

(i) Makes publicly available library services and materials suitable for scholarly research and not otherwise available to the public; and

(ii) Is not an integral part of an institution of higher education; and

(5) A private library, but only if the state in which such private library is located determines that the library should be considered a library for the purposes of this definition.

(e) Library consortium. A "library consortium" is any local, statewide, regional, or interstate cooperative asso-

SOURCE Dedera

ciation of libraries that provides for the systematic and effective coordination of the resources of schools, public, academic, and special libraries and information centers, for improving services to the clientele of such libraries. For the purposes of these rules, references to library will also refer to library consortium.

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(f) Lowest corresponding price. "Lowest corresponding price" is the lowest price that a service provider charges to non-residential customers who are similarly situated to a particular school, library, or library consortium for similar services.

(g) Master contract. A "master contract" is a contract negotiated with a service provider by a third party, the terms and conditions of which are then made available to an eligible school. library, rural health care provider, or consortium that purchases directly from the service provider.

(h) Minor contract modification. A "minor contract modification" is a change to a universal service contract that is within the scope of the original contract and has no effect or merely a negligible effect on price, quantity, quality, or delivery under the original contract.

(i) National school lunch program. The "national school lunch program" is a program administered by the U.S. Department of Agriculture and state agencies that provides free or reduced price lunches to economically disadvantaged children. A child whose family income is between 130 percent and 185 percent of applicable family size income levels contained in the nonfarm poverty guidelines prescribed by the Office of Management and Budget is eligible for a reduced price lunch. A child whose family income is 130 percent or less of applicable family size income levels contained in the nonfarm income poverty guidelines prescribed by the Office of Management and Budget is eligible for a free lunch.

(j) Pre-discount price. The "pre-discount price" means, in this subpart, the price the service provider agrees to accept as total payment for its telecommunications or information services. This amount is the sum of the amount the service provider expects to

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§54.500

Intesar Terkawi

Docket No. 080065-TX Exhibit IT-2 (Page 29 of 128) Non-Confidential Portion of Audit Work Papers

From:Intesar TerkawiSent:Tuesday, October 02, 2007 2:50 PMTo:Lynn DeamerSubject:FW: Missing Documents

From: vilaire@comcast.net [mailto:vilaire@comcast.net]
Sent: Tue 10/2/2007 2:36 PM
To: Intesar Terkawi
Cc: Stanley Johnson
Subject: Re: Missing Documents

We provided the 497's and the detailed customer list that supports the billing for the 497's, I still don't know what it is you are asking for that hasn't been provided?

Sent from my iPhone

On Oct 2, 2007, at 11:28 AM, "Intesar Terkawi" <ITerkawi@PSC.STATE.FL.US> wrote:

I need transactions detail file that supports the amounts in DETAIL. I do not need the records for USAC payments. I need the detiled transactions file that you use to request the payments from USAC.

Intesar Terkawi, CPA Regulatory Analyst Florida Public Service Commission 2540 Shumard Oak Blvd. Tallhassee, Fl 32399-0850 Voice Mail: (850) 413-6834 Fax: (850) 413-6835 Office: (407) 327-9364 iterkawi@psc.state.fl.us Please Note: Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Therefore, your e-mail communication may be subject to public disclosure.

From: vilaire@comcast.net [mailto:vilaire@comcast.net] Sent: Tue 10/2/2007 12:39 PM To: Intesar Terkawi Subject: RE: Missing Documents

I don't understand what it is you are looking for. As discussed previously, we use quickbooks and post the USAC payments directly to quickbooks in their entirety. We do not have any additional records for USAC payments.

Docket No. 080065-TX Exhibit IT-2 (Page 30 of 128) Non-Confidential Portion of Audit Work Papers

From: Intesar Terkawi [mailto:ITerkawi@PSC.STATE.FL.US] Sent: Tuesday, October 02, 2007 5:35 AM To: vilaire@comcast.net Cc: Lynn Deamer Subject: RE: Missing Documents

Good Morning Stan,

The spread sheet you e-mailed to me has the exact amounts that are on forms FCC497, what I need is BOTH, the Billing Register sent electronically to me, and the

General Ledger, that has the details of the amounts reported on the forms FCC497, sent electronically to me.

Thank you for your help in this matter.

Intesar Terkawi, CPA Regulatory Analyst Florida Public Service Commission 2540 Shumard Oak Blvd. Tallhassee, Fl 32399-0850 Voice Mail: (850) 413-6834 Fax: (850) 413-6835 Office: (407) 327-9364 iterkawi@psc.state.fl.us

Please Note: Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Therefore, your e-mail communication may be subject to public disclosure.

	kawi	
From:	Intesar Terkawi	Sent: Tue 10/30/2007 9:56 AM
To:	vilaire@comcast.net	
Cc:	Lynn Deamer	
Subject:	RE: General Ledger	Docket No. 080065-TX
-	: _] Copy of FL Fed Dep.xls(31KB)	Exhibit IT-2 (Page 31 of 128) Non-Confidential Portion of Audit Work Papers
The first two	ne journal ledger that you sent me, and that is sup months June and July 2006 in the general ledger xlain the reason. Thanks.	pposed to reconcile to the FCC-497 forms filing. reconciled to the Forms FCC-497 filing,but the rest of the months
2540 Shuma Tallhassee, I Voice Mail: (Fax: (850) 41 Office: (407) iterkawi@pse Pleose Note: Mc	Analyst ic Service Commission rd Oak Blvd. FI 32399-0850 850) 413-6834 3-6835 327-9364 c.state.fl.us	ding state business are public records available to the public and media public disclosure.
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Sent: Mon 10 Fo: Intesar Te Cc: stanj@vci Subject: RE: Hello Intesar, See attached s eriod request	y/1/2007 2:18 PM erkawi company.com Missing Documents spreadsheet showing ledger entries in quickbook	s that support the amounts stated in the forms FCC497 for the
Sent: Mon 10 Fo: Intesar Te Cc: stanj@vci Subject: RE: Hello Intesar, See attached s Period request	y/1/2007 2:18 PM erkawi company.com Missing Documents spreadsheet showing ledger entries in quickbook	s that support the amounts stated in the forms FCC497 for the
Sent: Mon 10 Fo: Intesar Te Cc: stanj@vci Subject: RE: Hello Intesar, See attached s eriod request	y/1/2007 2:18 PM erkawi company.com Missing Documents spreadsheet showing ledger entries in quickbook	s that support the amounts stated in the forms FCC497 for the
Sent: Mon 10 Fo: Intesar Te Cc: stanj@vci Subject: RE: Hello Intesar, See attached s period request	y/1/2007 2:18 PM erkawi company.com Missing Documents spreadsheet showing ledger entries in quickbook	s that support the amounts stated in the forms FCC497 for the

Sent: Thursday, September 27, 2007 11:48 AM

To: vilaire@comcast.net Cc: Lynn Deamer Subject: Missing Documents

Docket No. 080065-TX Exhibit 1T-2 (Page 32 of 128) Non-Confidential Portion of Audit Work Papers

Hello Stan,

In your answer to Document Request No. 1, you supported the documents needed for item 1, but you failed to support the documents needed for item 2. Can you please provide the documents needed in item 2, electronically, and in a hard copy. Thanks.

Intesar Terkawi, CPA Regulatory Analyst Florida Public Service Commission 2540 Shumard Oak Blvd. Tallhassee, Fl 32399-0850 Voice Mail: (850) 413-6834 Fax: (850) 413-6835 Office: (407) 327-9364 iterkawi@psc.state.fl.us

Please NOte: Most written communications to or from state officials regarding state business are public records available to the public and media upon request. Therefore, your e-mail communication may be subject to public disclosure.

5-16

Docket No. 080065-TX Exhibit 1T-2 (Page 33 of 128) Non-Confidential Portion of Audit Work Papers

AUDIT MANAGER: Intesar Terkawi

11. 20

COMPANY:	Vilaire Communications, Inc. (VCI)
TITLE:	Phone Audit
PERIOD:	2006 - 2007
DATE:	21-Sep-07

		ESTIMATED HOURS	HOURS	INITIALS	WORK PAI
1.	PRE-FIELD WORK PLANNING AND PROCEDURES				
					1
Α.	OBJECTIVES				
	 To ensure that the audit is properly planned. 	1			
	2 To ensure that the staff has sufficient technical training, proficiency, and	1			
	knowledge of the subject matter required for the audit.				
	3 To gain an understanding of the audit requirements and company operations]
	4 To ensure that the staff is independent.	1 1			}
	PROCEDURES				1
в		1			
	1 Read as applicable:	1		}	
	 Permanent and correspondence files (update as necessary) Drive ordern 		0.5	п	5 Series
	b. Prior orders	1 1	0.5	Π	5 Series
	 Commission Rules and Regulations Uniform Systems of Accounts (USCA) 		0.5	"	J Selles
	d Uniform Systems of Accounts (USOA)	1			
	 Review any internal audits or notes from last audit Review arthibits and testimony. Elect if any 		1	π	Not Inclu
	 Review exhibits and testimony filed, if any. Review exhibits and testimony filed, if any. 	1		1 "	Not mou
	g. Review company annual reports h. Review ASR		0.5	म	
		1	0.5	1	
	i Review 47 CFR Parts 32, 36 and 54 j Review prior audits	1			
	j Review prior audits			1	
	2 Read and review current confidential information procedures and update the			Í	
	log throughout the audit				ł
	a. Rule 25-22.006, F.A.C., CONFIDENTIAL INFORMATION (Required in	4			
	EPSC APM 11.04.0.2.d.				
	 p. FPSC Administrative Procedures Manual Chapter 11.04 	1.		1	1
	 Read confidential memo dated 2/15/94 from D. Vandiver. 				
	 d. Confidential Procedures in Audit Manual; 				1
				1]
	(1) Maintain a detailed log for the RECEIPT and DISPOSITION of all				
	confidential materials received from the Company on Work paper 11.	1			
	Maintain a listing of all Auditor created pages containing conf info.				
		1			
	(2) At the end of field work, have the Utility representative examine each			ļ	
	page of the marked work papers to determine if any can be declassified.	1 1			{
	Any documents and work papers which contain confidential information	1 1			
	and which are not returned to the Utility must be placed in the confidential				
	binder. A copy of each confidential work paper will be made for the utility.				
	(3) The original work papers (confidential work papers and CDs)			1	1
	will be transmitted to Tallahassee. No confidential information will be				
	retained in the District Office. The District Office will retain a copy of the	1			
	non-confidential CDs and work papers.				ļ
				ł	
	3 Discuss matters that may affect the audit with other Commission staff	1			
	members, as appropriate.	1 1			
	a. Analyst: John Mann	1 1			
	b. Date 1st contacted: September 17, 2007				
	4 Determine EDP data to be used and analyzed.	1		1	1
	 Prepare initial EDP requests to obtain EDP data. 			1	
	5 Write the audit program using steps in the audit manual guidelines, the				
	Audit Service request and similar audits	1			
	6 Prepare a TIME BUDGET:	1 I		5	1
	a. Estimated audit hours			1	
	b. Estimated travel hours	1			
	c. Total hours required for audit				
	7 Establish the timing of audit work by				
	estimating the following dates.	}			
	 Begin field work: September 14, 2007 				
	b. End field work: November 6th, 2007				
	c Supervisor interim review	ļ l			
	d. Audit exit conference if required	ł l			l
	e. Fax "Draft Report" to Tallahassee				
	f. Supervisor final review	I			
	g. Mall to Tallahassee				
	h. Due date in Tallahassee				
	8 Hold a pre-audit conference with company management. Discuss the timing				1
	of the audit and review, expected completion and exit dates. Determine the				
	the company representative responsible for our audit requests. Issue				
	standard document requests and create and update request log.	1			
	a. Company Contact				1
	a, company contact	I		t 1	l
	b. Telephone No. (206) 419-5948	4 4			

SOURCE AS Indiant

COMPANY: Vilaire Communications, Inc. (VCI) TITLE: Phone Audit 2006 - 2007 21-Sep-07 PERIOD:

AUDIT MANAGER: Intesar Terkawi

DATE:

21-0ep-

		ESTIMATED	1		WORK PAPE
		HOURS	HOURS	INITIALS	NUMBER
	throughout the audit	1			1
	d. Update log.	1			1
9	Perform Analytical Review procedures to determine if there are any material				
	changes or inconsistencies and to assist in assessing risk.				
	If yes:			l I	
	a. Ask company to explain			ſ	
	 Determine if any additional audit procedures are required 				
10	Review filing to determine which schedules need to be				
	used as lead schedules and to obtain information for various sections.				
11	Write initial requests to start the audit.	1		ł	1
	Assign work and organize data to give to auditors based on the auditors				
	skills and capabilities.	1			
	Read Interrogatories to determine if any information is useful to the audit.				
	Prepare Risk Assessment worksheet and determine effect on program.	1			
15	Document auditor independence by having each auditor assigned				ľ
	initial this program for the following:	Auditor 1			
		(Intesar Terka	awi)		1
	a I do not have any professional, personal, financial or official relationships				
	with the company being audited.	(T			1
	(Excluding an ordinary customer relationship with the utility)				1
	b. I do not hold a position of influence in a group that is biased for	т			1
	or against this company.				I .
	•				1
	c. I have not approached the company or negotiated salary for a position in the last short of a salary for a position.				1
	in the last ninety days.	١ĭ			l i
	 I have not accepted any gifts from any member of the company. 				
	(excludes any family member who worked for the company prior to hire	1 1			ł
	and involves no intent to influence the case)	iπ			
	e. I do not own any stock in the company.	ा ।			1
OB.	JECTIVE:				
То	JECTIVE: determine whether the Carrier has submitted accurate underlying company data for				
То	JECTIVE:				
To a the	JECTIVE: determine whether the Carrier has submitted accurate underlying company data for calculation of Universal Service support for the years 2005 through 2006 Obtain and review the following documents from the Carrier/ETC for timely				
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SOURCE A. Indicated

Docket No. 080065-TX Exhibit IT-2 (Page 35 of 128) Non-Confidential Portion of Audit Work Papers

COMPANY: Vilaire Communications, Inc. (VCI) TITLE: Phone Audit PERIOD: 2006 - 2007 DATE: 21-Sep-07

AUDIT MANAGER: Intesar Terkawi

		ESTIMATED HOURS	ACTUAL HOURS	INITIALS	WORK PAPE
111.	REVIEW AND FINALIZATION PROCEDURES				
Α.	OBJECTIVES				1
	To determine if the audit staff fully understands the audit requirements				
	and is competent to perform the audit, to determine if the auditor is exercising				ł
	professional skepticism, to determine if the auditor properly documented				
	evidential matter and properly reported the audit findings, and to properly account				
	for all confidential work papers.				
₿.	PROCEDURES				
	1 REVIEW PROCESS	1			
	 Submit audit work papers to supervisor for interim reviews. 	1 1		1	
	b. Review work program and work performed to determine if auditor				
	fully understands the audit request and is progressing as expected.			ļ	
	c. Review the audit for compliance with section 2501 of the audit manual.				
	(1) Annotate WP 2 to appropriate audit work papers.				
	(2) Auditors and supervisors must initial and date work papers				
	(3) Reviewer must ensure that summary and/or lead schedules are used	1			
	to describe procedures performed and all findings.				
	d Deserve Dest Audit Based		40	ιŢ	
	d. Prepare Draft Audit Report.		40	1+	
	 Summarize audit and travel hours for all work paper sections. Augusta Audit Contract Section 2 		2		
	f. Annotate Audit Service Request with:		2	T	· · ·
	(1) Audit Program step that accomplishes Analyst requests.				
	(2) Work paper references to actual work performed.				
	g. Supervisor Review and make corrections	1			
	h. Annotate WP-1 Audit Report	1	1	IT	
	i. Fax to Bureau Chief and make necessary corrections.				
	j. If EDP section used, provide feedback regarding services provided.				
	2 Audit Exit Conference (only if confidential information provided by company)				
	a. List and copy all confidential materials that will be retained.				
	 b. Update WP 11 indicating which materials are retained and which 				
	are returned.				
	c. Prepare Audit Exit Conference letter				
	 (1) Include date of exit conference. (2) Include actification of 0.1 days filter acting and 0.1 a 0.5 00,000 FAG. 	1 1			
	(2) Include notification of 21 day filing period and Rule 25-22.006 FAC	1			
	(3) Attach a clear listing and count of confidential pages.	1 1			
	(4) Review copies provided to company to verify they are clear and readable.(5) Place original audit work papers in red binder.				
	d. Schedule Audit Exit conference and transmit letter and copies to company.				
	(1) Obtain company representative signature that letter and copies received.				
	3 If EDP section used, provide feedback regarding services provided.				
	TOTAL	•	255.5		
	Available Hours	1			
	Travel	1	i		
	Supervisor Hours				
	4 Identify standard tick marks used in the audit.	1 1			

- a Traced to general ledgers 7 b Computed 7 c Recomputed by auditor 7 d Foot

- d Foot e Cross Foot

SOURCE AS Indicated

Docket No. 080065-TX Exhibit IT-2 (Page 36 of 128) Non-Confidential Portion of Audit Work Papers

				DOCUMENT REQUEST LOG Vilaire Communications, Inc.	1
					and the second state of th
				Low Income Beneficiary Audit	
,				ocketed Audit Control No.: 07-250-1-2	_
	Date of	Requested	Date		
Req	Request	Due Date	Received	Description	Disposition
				Names of Customers and financial data	See WP 11
1	9/14/2007	9/18/2006	9/26/2007	supporting forms FCC 497	
2	9/14/2006	9/19/2006	0.000.000	Forms 497, 499Q, 499A, Annual Filings with	Forms 497 WP 18. Forms 499Q a
_			9/26/2007	USAC, and NECA	499A See WP 11
3	9/14/2006	9/19/2006	9/26/2007	Advertsements Support	See WP 11
4	9/14/2006	9/19/2006	9/26/2007	Support for Termination Rule of Subscribers	WP 21
5	9/14/2006	9/19/2006	9/26/2007	Commercial Agreements	SEE WP 11
6	9/14/2006	9/19/2006		Explanation of differences between VCI, and	SEE WP 25
			9/26/2007	other phone companies	
7	9/14/2006	9/19/2006		Explanation of reasons for Discontinuing	SEE WP 24
			9/26/2007	Services in Oregon and Washington	
8	9/14/2006	9/19/2006	9/26/2007	The application process for subscribers	SEE WP 10/5
9	9/14/2006	9/19/2006	9/26/2007	Name of customers served by the company's	See WP 11
				facilities, another underlying carrier, resale of	
				another carrier.	
10	9/26/2006	10/1/2007	10/9/2007	Electronic G/L, and Electronic Customers Names	G/L WP 12, Electronic Custome
					Names, SEE WP 11
11	10/3/2007	10/8/2007	10/9/2007	Advertisements Support	See WP 15//1
12	10/3/2007	10/8/2007		Support for USAC and USF reporting	SEE WP 10/9
13	10/3/2007	10/8/2007	10/9/2007	Customers Bills	SEE WP 11
14	10/3/2007	10/8/2007	10/9/2007	TLS Support	See WP 11
15	10/3/2007	10/8/2007	10/9/2007	VCI Customers through resale of another carrier	SEE WP 10/10
16	10/17/2007	10/22/2007	10/24/2007	Support for RAF	SEE WP 11
17	10/17/2007	10/22/2007	10/24/2007	USF Data Collection Forms	SEE WP 10/11
18	10/17/2007	10/22/2007	10/24/2007	Utilization of resold lines and Reimburesement	SEE WP 10/12
19	10/17/2007	10/22/2007		TLS Details	SEE WP 11
20	10/18/2007	10/22/2007	10/24/2007	Reconciliation of Advertisement costs to G/L	SEE WP 11
21	10/18/2007	10/22/2007	10/24/2007	Samples of termination Letters and bills	SEE W/P 21/-1
22	10/18/2007	10/22/2007	10/24/2007	Single Line, multi-line residential and businesses	SEE WP 10/13
23	10/18/2007	10/23/2007		Low Income Program eligibility	SEE WP 10/14
24	10/22/2007	10/25/2007	11/6/2007	499-Q, and 499-A support dcoumentations	SEE WP 10/17
25	10/25/2007	10/29/2007	10/29/2007	Choice of Toll Limited Service	SEE WP 25-7
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Source: As referenced

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

Docket No. 080065-TX T Exhibit IT-2 (Page 37 of 128) Non-Confidential Portion of Audit Work Papers

TO:	Stan Efferding	
Utility :	Vilaire Communications, Inc.	
FROM:	Intesar Terkawi	DATEOFREQUEST: Sep. 14, 2007
	(Auditor Preparing Request)	Due Date : Sep 18, 2007

- Please provide a list of names, addresses, account number, and phone numbers for the customers reported on the form FCC497 for the period from June 1st 2006 until June 30th 2007.
- 2. Please provide the billing system and the G/L that support the amounts stated in the forms FCC497 for the period from June 1st 2006 until June 30th 2007.

Vilaire Communications, Inc.		
Phone Audit Control No. 07-250-1-2		
From June 1st, 2006 - June 30th, 2007		-
Description V Stranger V Stranger	11 04	11

THE REQUESTED RECORD OR DOCUMENTATION:

Γ	(1)	HAS BEEN PROVIDED TODAY						
	(2)	CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY						
	(3) AND IN MY OPINION, ITEM(S) IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION 2 DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C							
	(4)	THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)						
		SIGNATURE AND TITLE OF RESPONDENT)	,					
			0-1					
Di	stribu	tion: Original: Utility (for completion and return to Auditor) Copy: Audit File and FPSC Analyst						
PS	PSC/AFA-6 (Rev.2/95)							
	SO	URCE_fis_finducing						

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

S1 Docket No. 080065-TX Exhibit IT-2 (Page 38 of 128) Non-Confidential Portion of Audit Work Papers

X OUTSIDE OF AN INQUIRY

TO:	Stan Effe								
Utility :	Vilaire	Communications,	Inc.						
FROM:	Intesar Terkawi		DAT		DATEOFREQUEST:		Sep. 14, 2007		
	(Auditor	Preparing Request)		Due	Date	:	Sep 19,	2007	
REQUEST NU									
AUDIT PURPO									
REQUEST THI	E FOLLOWIN	G ITEM(S) BE PRO	VIDED	BY:					
REFERENCE RU	ULE 25-22.0	06, F.A.C., THIS	REQUESI	r is 3	MADE :		INCIDENT	TO AN INQU	JIRY

- 1. Please provide The following forms that were filed with the FCC for the period from June 1st 2006 until June 30th 2007: Form 497, Form 499-Q, and form 499-A.
- 2. Please provide the annual filings and correspondence that were filed with USAC for the period ended June 30th 2007.
- 3. Please provide the annual filings that were filed with NECA.

THE REQUESTED RECORD OR DOCUMENTATION:

(1) HAS BEEN PROVIDED TODAY

	CANNOT BE					

(3) AND IN MY OPINION, ITEM(S) IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL, THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.

(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

SIGNATURE AND TITLE OF RESPONDENT)

Distribution: Original: Utility (for completion and return to Auditor) U-2Copy: Audit File and FPSC Analyst

PSC/AFA-6 (Rev.2/95)

SOURCE As Inducated

FLORIDA PUBLIC SERVICE COMMISSION AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT

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Docket No. 080065-TX Exhibit IT-2 (Page 39 of 128) Non-Confidential Portion of Audit Work Papers

X OUTSIDE OF AN INQUIRY

TO:	Stan Efferding	Non-Confidential Portion of Audit w				
Utility:	Vilaire Communications	, Inc.				
FROM:	Intesar Terkawi	-	DATEOFREQUEST: Sep. 14, 2007			
	(Auditor Preparing Request)		Due Date :	Sep 19, 2	ל ס ס	
REQUEST NU						
	E FOLLOWING ITEM(S) BE P	OVIDED	BY ·			
~	ULE $25-22.006$, F.A.C., THIS			INCIDENT TO	AN INCUIRY	

 Please provide documentations to support your advertsements for your Services as supported by the Federal Universal Service Support Mechanisms for the period from June 1st 2006 until June 30th 2007. Thanks.

THE REQUESTED RECORD OR DOCUMENTATION:

(1)	HAS	BEEN	PROVIDED	TODAY
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(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY

(3)	AND IN MY OPINION, ITEM(S) IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS
	DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL,
	THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR
	CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF RECORDS AND REPORTING. REFER TO RULE 25-22.006, F.A.C.

(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

SIGNATURE AND TITLE OF RESPONDENT)

 $\left| v - 3 \right|$

Distribution: Original: Utility (for completion and return to Auditor) Copy: Audit File and FPSC Analyst

PSC/AFA-C ter(2/95)

VCI Company

Docket No. 080065-TX Exhibit IT-2 (Page 40 of 128) Non-Confidential Portion of Audit Work Papers

Р.О. Бод 98907 Lakewood, (1⁴ - 98496-8907 Phone (800) 923-8373 Tax: (253) 475-6328

Via Overnight Delivery

October 25, 2007

Intesar Terkawi, Auditor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description Com Panyor Corporte Milorit I. F

Re: Audit Control No. 07-250-1-2 Revised Advertising Spreadsheet and Resubmitted Advertising Invoices

Dear Ms. Terkawi:

Enclosed, in a sealed envelope, is a CD-ROM with a copy of your advertising excel spreadsheet revised with additional advertising figures. We have also submitted additional copies of advertising invoices we believe were previously submitted as part of Attachment C. The additional invoices are inserted into the spreadsheet under the applicable television station by invoice number.

Questions regarding this filing may be directed to me at (253) 973-2476 or stanj@vilaire.com.

Sincerely,

VCI Company

Stanley Johnson President



	FLOR. A PUBLIC SERVI AUDIT DOCUMENT/REC NOTICE OF IN	CORD REQUES	ON Docket No. 080065-TX Exhibit IT-2 (Page 41 of 128) Non-Confidential Portion of Audit Work Paper
TO: Stan Ef	ferding	UTILITY: Vila	aire Communications, Inc
AUDIT MANAG	BER: Intesar Terkawi	BY: Wir	esar Terkawi, 407-327-9364,) Blenheim Loop nter Springs, FL_32708 kawi@psc.state.fl.us
REQUEST NU	MBER: 4	DATE OF REQU	EST: September 14, 2007
AUDIT PURPO	SE: USF Audit Audit Control No.	07-250-1-2	
REQUEST THE	FOLLOWING ITEM(S) BE PROVIDED	BY: Septembe	er 19, 2007
REFERENCE RU	JLE 25-22.006, F.A.C., THIS REQUEST IS I		DENT TO AN INQUIRY SIDE OF AN INQUIRY
date of impe	de proper documents showing that you a nding termination when you have the ba -ling qualifying criteria. Thanks.	•	· •
TO: AUDIT MANAGE	R	DATE	
THE REQUESTED RE	ECORD OR DOCUMENTATION:		
(1) 🗆	HAS BEEN PROVIDED TODAY		
(2) 🗆	CANNOT BE PROVIDED BY THE REQUESTED	DATE BUT WILL BE I	MADE AVAILABLE BY:
(3) 🗆	AND IN MY OPINION, ITEM(S) IS INFORMATION AS DEFINED IN 364.183, 366.0 CONFIDENTIAL HANDLING OF THIS MATERIA 21 DAYS AFTER THE AUDIT EXIT CONFEREN	093, OR 367.156, F.S. AL. THE UTILITY OR C	TO MAINTAIN CONTINUED ITHER PERSON MUST, WITHIN

(4) 🗆	THE	ITEM WILL N	NOT BE PROVIE	ED. (SEE	ATTACHED	MEMORANDUM)
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CLASSIFICATION WITH THE DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.

FLOR. A PUBLIC SERVICE COMMI JON AUDIT DOCUMENT/RECORD REQUEST NOTICE OF INTENT Docket No. 080065-TX Exhibit IT-2 (Page 42 o Non-Confidential Porti

Docket No. 080065-TX Exhibit IT-2 (Page 42 of 128) Non-Confidential Portion of Audit Work Pape

TO: Sta	an Efferd	ing	UTILITY:	Vilaire Communications, Inc		
AUDIT MA	NAGER:	Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us		
REQUEST		:R: 5	DATE OF RE	EQUEST: September 14, 2007		
AUDIT PU	RPOSE:	USF Audit Audit Control No.	07-250-1-2			
REQUEST	REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: September 19, 2007					
REFERENC		25-22.006, F.A.C., THIS REQUEST IS I		INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY		
ITEM DES	CRIPTIO	N:				
Please pro	vide a co	py of any commercial agreement yo	u have with an	other carrier in Florida. Thanks		
TO: AUDIT MA			DATE			
THE REQUEST	TED RECOF	RD OR DOCUMENTATION:				
(1)		HAS BEEN PROVIDED TODAY				
(2)		CANNOT BE PROVIDED BY THE REQUESTED	D DATE BUT WILL	. BE MADE AVAILABLE BY:		
(3)		AND IN MY OPINION, ITEM(S) IS NFORMATION AS DEFINED IN 364.183, 366.0 CONFIDENTIAL HANDLING OF THIS MATERIA 21 DAYS AFTER THE AUDIT EXIT CONFEREN CLASSIFICATION WITH THE DIVISION OF TH SERVICES. REFER TO RULE 25-22.006, F.A.0	093, OR 367.156, F AL. THE UTILITY (NCE, FILE A REQU E COMMISSION C	OR OTHER PERSON MUST, WITHIN JEST FOR CONFIDENTIAL		
(4)		THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMOR	(ANDUM)		
SOURC Distribution:	SOURCE As Indicated (SIGNATURE AND TITLE OF RESPONDENT) 10-5 Distribution: Original: Utility (for completion and return to Auditor) Copy: Audit File					
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FLOR A PUBLIC SERV AUDIT DOCUMENT/RE NOTICE OF I	CORD REQUEST				
TO: Stan Efferding	UTILITY: Vilaire Communications, Inc				
AUDIT MANAGER: Intesar Terkawi	PREPARED Intesar Terkawi, 407-327-9364, 679 Blenheim Loop BY: Winter Springs, FL 32708 iterkawi@psc.state.fl.us				
REQUEST NUMBER: 6	DATE OF REQUEST: September 14, 2007				
AUDIT PURPOSE: USF Audit Audit Control No	07-250-1-2				
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED	D BY: September 19, 2007				
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS	MADE: INCIDENT TO AN INQUIRY x OUTSIDE OF AN INQUIRY				
Please provide an explanation for the difference in TLS support collected by your company versus the TLS amount collected by other carriers like Verison, At&t and Embarq. Thanks.					
TO: AUDIT MANAGER	DATE				
 (1)	ED DATE BUT WILL BE MADE AVAILABLE BY:				
(3) AND IN MY OPINION, ITEM(S) I INFORMATION AS DEFINED IN 364.183, 366 CONFIDENTIAL HANDLING OF THIS MATER 21 DAYS AFTER THE AUDIT EXIT CONFERE	S (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS 0.093, OR 367.156, F.S. TO MAINTAIN CONTINUED NAL. THE UTILITY OR OTHER PERSON MUST, WITHIN ENCE, FILE A REQUEST FOR CONFIDENTIAL HE COMMISSION CLERK AND ADMINISTRATIVE				
(4) THE ITEM WILL NOT BE PROVIDED. (SEE A	ATTACHED MEMORANDUM)				

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0011	RCE AS TUNDICO RESPONDENT)	10-6
2001	AUE <u>AS INGLEET XA</u>	
Distribution:	Original: Utility (for completion and return to Auditor) Copy: Audit File	

		FLOR A PUBLIC SER AUDIT DOCUMENT/RI NOTICE OF	ECORD REQU	
TO: Sta	an Effe	rding	UTILITY:	Vilaire Communications, Inc
AUDIT MA	NAGE	R: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST		BER: 7	DATE OF RE	QUEST: September 14, 2007
AUDIT PU	RPOSE	E: USF Audit Audit Control N	o. 07-250-1-2	
REQUEST	THE F	OLLOWING ITEM(S) BE PROVIDE	D BY: Septen	nber 19, 2007
REFERENC	CE RULI	E 25-22.006, F.A.C., THIS REQUEST I		NCIDENT TO AN INQUIRY
ITEM DES	CRIPTI	ON:	x O	OUTSIDE OF AN INQUIRY
Oregon and	d Wash	detailed explanation for the reason o ington, and the investigation your co two states or any other states.		
TO: AUDIT MAN	NAGER		DATE	
THE REQUEST	ED REC	ORD OR DOCUMENTATION:		
(1)	D	HAS BEEN PROVIDED TODAY		
(2)	D	CANNOT BE PROVIDED BY THE REQUEST	ED DATE BUT WILL I	BE MADE AVAILABLE BY:
(3)	D	AND IN MY OPINION, ITEM(S) INFORMATION AS DEFINED IN 364.183, 364	IS (ARE) PROPRIETA 6.093, OR 367.156, F.	RY AND CONFIDENTIAL BUSINESS S. TO MAINTAIN CONTINUED

<i>י</i> ן	ω	
		INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED
		CONFIDENTIAL HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON MUST, WITHIN
		21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL
		CLASSIFICATION WITH THE DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE
		SERVICES. REFER TO RULE 25-22.006, F.A.C.

(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

10-1 (SIGNATURE AND TITLE OF RESPONDENT) SOURCE AS INGLASS Distribution: Original: Utility (for completion and return to Auditor) Copy: Audit File

	FLOR A PUBLIC SERV AUDIT DOCUMENT/RE NOTICE OF I	CORD REQU	JEST Docke Exhibi	t No. 080065-TX t IT-2 (Page 45 of 128) onfidential Portion of Audit Work Pape
TO: Stan E	ifferding	UTILITY:		mmunications, Inc
	GER: Intesar Terkawi	PREPARED BY:	Intesar Terka 679 Blenheim Winter Spring iterkawi@psc	IS, FL 32708
REQUEST NU	IMBER: 8	DATE OF RE	EQUEST:	September 14, 2007
AUDIT PURPO	DSE: USF Audit Audit Control No. E FOLLOWING ITEM(S) BE PROVIDED	<u></u>	mber 19, 2	007
REFERENCE R	ULE 25-22.006, F.A.C., THIS REQUEST IS			TO AN INQUIRY OF AN INQUIRY
 How the How you notificati 	lication process for subscribers. subscriber becomes aware of LifeLine p ur company becomes aware of subscribe on, etc.) tres for dertermining ineligible customers	rs (upon applia	action, qua	lifying agency
TO: AUDIT MANAGE	ĒR	DATE		
THE REQUESTED F	RECORD OR DOCUMENTATION:			
(1) 🛛	HAS BEEN PROVIDED TODAY			
(2)	CANNOT BE PROVIDED BY THE REQUESTE	D DATE BUT WILL	. BE MADE A	AILABLE BY:
(3) 🗆	AND IN MY OPINION, ITEM(S) IS INFORMATION AS DEFINED IN 364.183, 366. CONFIDENTIAL HANDLING OF THIS MATERI 21 DAYS AFTER THE AUDIT EXIT CONFERE CLASSIFICATION WITH THE DIVISION OF TH SERVICES. REFER TO RULE 25-22.006, F.A.	093, OR 367.156, F AL. THE UTILITY NCE, FILE A REQU E COMMISSION O	F.S. TO MAIN OR OTHER P JEST FOR CO	ERSON MUST, WITHIN DNFIDENTIAL
(4) 🛛	THE ITEM WILL NOT BE PROVIDED. (SEE A	TTACHED MEMOR	ANDUM)	
SOURCE. Distribution: Orig	As Indiana (SIGNATURE AND ginal: Utility (for completion and return to Auditor)	TITLE OF RESPON	IDENT)	10-8

FLOR A PUBLIC SERVICE COMM	ION
AUDIT DOCUMENT/RECORD REQUE	S Doc
NOTICE OF INTENT	Exh

Docket No. 080065-TX Exhibit IT-2 (Page 46 of 128) Non-Confidential Portion of Audit Work Papers

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					Non-Co	onfidential Portion of Audit Work P
TO: S	tan Effe	rding		UTILITY:	Vilaire Co	ommunications, Inc
AUDIT M	ANAGE	R: Intesar Terka	wi	PREPARI BY:	679 Blenheir	gs, FL 32708
REQUES		BER: 9		DATE OF	REQUEST:	September 17, 2007
	JRPOSE	E: USF Audit	Audit Control No.	07-250-1-2	2	
REQUES	T THE F	OLLOWING ITEM	(S) BE PROVIDED	BY: Se	ptember 20, 2	2007
REFEREN			THIS REQUEST IS N	MADE:		TO AN INQUIRY DF AN INQUIRY
	•	vide a list of custor by your own faciliti	ners names, accour ies.	nt number,	phone numbe	ers, addresses, that
	•		ners names, accoun lements of another ι			ers, addresses, that
			ners names, accoun inother Carrier's ser		phone numb	pers, addresses, that
Thanks	S.					
TO: AUDIT M	ANAGER	***********	<u></u>	DATE		
THE REQUES	STED REC	ORD OR DOCUMENTA	TION:			
(1)		HAS BEEN PROVIDE	D TODAY			
(2)	D	CANNOT BE PROVID	ED BY THE REQUESTED	DATE BUT V	VILL BE MADE A	VAILABLE BY:
(3)		INFORMATION AS DE CONFIDENTIAL HAND 21 DAYS AFTER THE CLASSIFICATION WIT	ITEM(S) IS FINED IN 364.183, 366.0 DLING OF THIS MATERIA AUDIT EXIT CONFEREN TH THE DIVISION OF THE TO RULE 25-22.006, F.A.C	93, OR 367.19 NL. THE UTIL ICE, FILE A R E COMMISSIO	56, F.S. TO MAIN ITY OR OTHER F EQUEST FOR C	PERSON MUST, WITHIN ONFIDENTIAL
(4)		THE ITEM WILL NOT	BE PROVIDED. (SEE AT	TACHED ME	MORANDUM)	
SC)URCE_	As Indicated	(SIGNATURE AND TI	TLE OF RESI	PONDENT)	10-9

Distribution: Original: Utility (for completion and return to Auditor) Copy: Audit File

		FLOR A PUBLIC SERVI AUDIT DOCUMENT/REC NOTICE OF IN		
TO: Sta	n Effer	ding	UTILITY:	Vilaire Communications, Inc
AUDIT MAN	NAGEF	R: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST	NUMB	ER: 10	DATE OF RE	QUEST: September 26, 2007
AUDIT PUR	POSE	: USF Audit Audit Control No.	07-250-1-2	
REQUEST	THE F	OLLOWING ITEM(S) BE PROVIDED	BY: Octobe	er 1, 20, 2007
REFERENCE		25-22.006, F.A.C., THIS REQUEST IS N		NCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY
2. Pleas addre	se prov esses, a	1 st June, 2007 until June 30 th , 2007. ide an electronic copy – preferably in account number, Phone numbers, tha June 1 st 2007, until June 30 th 2007.		
TO: AUDIT MAN	AGER		DATE	
THE REQUESTE	ED RECO	ORD OR DOCUMENTATION:		
(1)	9	HAS BEEN PROVIDED TODAY		
(2)	9	CANNOT BE PROVIDED BY THE REQUESTED	DATE BUT WILL	BE MADE AVAILABLE BY:
(3)	9	AND IN MY OPINION, ITEM(S) IS INFORMATION AS DEFINED IN 364.183, 366.0 CONFIDENTIAL HANDLING OF THIS MATERIA 21 DAYS AFTER THE AUDIT EXIT CONFEREN CLASSIFICATION WITH THE DIVISION OF THI SERVICES. REFER TO RULE 25-22.006, F.A.C	93, OR 367.156, F AL. THE UTILITY (ICE, FILE A REQU E COMMISSION C	.S. TO MAINTAIN CONTINUED DR OTHER PERSON MUST, WITHIN EST FOR CONFIDENTIAL
(4)	9	THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMOR	ANDUM)

SOURC	EAS ration (SIGNAT	URE AND TITLE OF RESPONDENT)	10-10
Distribution:	Original: Utility (for completion and return to A	Auditor) Copy: Audit File	

	FLOR A PUBLIC SERV AUDIT DOCUMENT/REC NOTICE OF I	CORD REQUES
TO: St	an Efferding	UTILITY: Vilaire Communications, Inc
AUDIT MA	NAGER: Intesar Terkawi	PREPARED Intesar Terkawi, 407-327-9364, 679 Blenheim Loop BY: Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST	NUMBER: 11	DATE OF REQUEST: October 03, 2007
AUDIT PU	RPOSE: USF Audit Audit Control No.	07-250-1-2
REQUEST	THE FOLLOWING ITEM(S) BE PROVIDED	BY: October 08, 2007
	CE RULE 25-22.006, F.A.C., THIS REQUEST IS	MADE: 9 INCIDENT TO AN INQUIRY x OUTSIDE OF AN INQUIRY
WBI Janu		voices for the months of November 2006,
TO: AUDIT MA	NAGER	DATE
	ED RECORD OR DOCUMENTATION:	
(1)	9 HAS BEEN PROVIDED TODAY	
(2)	9 CANNOT BE PROVIDED BY THE REQUESTE	D DATE BUT WILL BE MADE AVAILABLE BY:
(3)	INFORMATION AS DEFINED IN 364.183, 366. CONFIDENTIAL HANDLING OF THIS MATERI 21 DAYS AFTER THE AUDIT EXIT CONFEREI	HE COMMISSION CLERK AND ADMINISTRATIVE
(4)	9 THE ITEM WILL NOT BE PROVIDED. (SEE A	TTACHED MEMORANDUM)
SOURCI	Astralicated (SIGNATURE AND T	TITLE OF RESPONDENT)
Distribution:	Original: Utility (for completion and return to Auditor) C	Copy: Audit File

	NOTICE OF	ECORD REQUEST INTENT Non-Confidential Portion of Audit Work
TO: Stan	n Efferding	UTILITY: Vilaire Communications, Inc
AUDIT MAN	IAGER: Intesar Terkawi	PREPARED Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us 32708
REQUEST	NUMBER: 12	DATE OF REQUEST: October 03, 2007
AUDIT PURI	POSE: USF Audit Audit Control N	lo. 07-250-1-2
REQUEST T	THE FOLLOWING ITEM(S) BE PROVIDE	ED BY: October 08, 2007
REFERENCE	RULE 25-22.006, F.A.C., THIS REQUEST	IS MADE: 9 INCIDENT TO AN INQUIRY x OUTSIDE OF AN INQUIRY
Thanks.		
O: AUDIT MANA	AGER	DATE
	AGER D RECORD OR DOCUMENTATION:	DATE
HE REQUESTED		DATE
HE REQUESTED	D RECORD OR DOCUMENTATION: 9 HAS BEEN PROVIDED TODAY	DATE
HE REQUESTED (1) (2) (2)	 D RECORD OR DOCUMENTATION: HAS BEEN PROVIDED TODAY CANNOT BE PROVIDED BY THE REQUES AND IN MY OPINION, ITEM(S)	TED DATE BUT WILL BE MADE AVAILABLE BY: IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS 66.093, OR 367.156, F.S. TO MAINTAIN CONTINUED ERIAL. THE UTILITY OR OTHER PERSON MUST, WITHIN RENCE, FILE A REQUEST FOR CONFIDENTIAL THE COMMISSION CLERK AND ADMINISTRATIVE
(1) (2)	 D RECORD OR DOCUMENTATION: HAS BEEN PROVIDED TODAY CANNOT BE PROVIDED BY THE REQUES AND IN MY OPINION, ITEM(S) INFORMATION AS DEFINED IN 364.183, 36 CONFIDENTIAL HANDLING OF THIS MATE 21 DAYS AFTER THE AUDIT EXIT CONFEE CLASSIFICATION WITH THE DIVISION OF SERVICES. REFER TO RULE 25-22.006, F 	TED DATE BUT WILL BE MADE AVAILABLE BY: IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS 66.093, OR 367.156, F.S. TO MAINTAIN CONTINUED ERIAL. THE UTILITY OR OTHER PERSON MUST, WITHIN RENCE, FILE A REQUEST FOR CONFIDENTIAL THE COMMISSION CLERK AND ADMINISTRATIVE A.C.

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	FLOR, A PUBLIC SERVI AUDIT DOCUMENT/REC NOTICE OF IN	CORD REQU	
TO: Stan E	fferding	UTILITY:	Vilaire Communications, Inc
AUDIT MANAG	GER: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST NU	MBER: 13	DATE OF RE	EQUEST: October 03, 2007
AUDIT PURPO	DSE: USF Audit Audit Control No.	07-250-1-2	
REQUEST TH	E FOLLOWING ITEM(S) BE PROVIDED	BY: Octob	er 08, 2007
REFERENCE R	ULE 25-22.006, F.A.C., THIS REQUEST IS		NCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY
TO: AUDIT MANAGE	R	DATE	
THE REQUESTED R	ECORD OR DOCUMENTATION:		
(1) 9	HAS BEEN PROVIDED TODAY		
(2) 9	CANNOT BE PROVIDED BY THE REQUESTE.	D DATE BUT WILL	BE MADE AVAILABLE BY:
(3) 9	AND IN MY OPINION, ITEM(S) IS INFORMATION AS DEFINED IN 364.183, 366.0 CONFIDENTIAL HANDLING OF THIS MATERI, 21 DAYS AFTER THE AUDIT EXIT CONFEREN CLASSIFICATION WITH THE DIVISION OF TH SERVICES. REFER TO RULE 25-22.006, F.A.	093, OR 367.156, F AL. THE UTILITY (NCE, FILE A REQU E COMMISSION C	S. TO MAINTAIN CONTINUED OR OTHER PERSON MUST, WITHIN ST FOR CONFIDENTIAL
(4) 9	THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMOR	ANDUM)
SOURCE	As Indicated (SIGNATURE AND T	TILE OF RESPON	DENT)

Distribution: Original: Utility (for completion and return to Auditor) Copy: Audit File

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<u>TO:</u>	Stan Effer	ding	UTILITY:	Vilaire Communications, Inc
AUDIT	MANAGE	R: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUE	ST NUMB	ER: 14	DATE OF R	EQUEST: October 03, 2007
AUDIT P	PURPOSE	USF Audit Audit Control No	o. 07-250-1-2	
REQUES	ST THE F	OLLOWING ITEM(S) BE PROVIDE	DBY: Octob	per 08, 2007
	NCE RULE	E 25-22.006, F.A.C., THIS REQUEST IS		INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
\$4.36	8223 for t nake up th	ine 2006, an amount of \$8.006503 f he month of May 2007, please prov le above stated amounts for these t	ide the details a	ind source of these numbers
O: AUDIT N	IANAGER		DATE	
HE REQUE	STED RECO	ORD OR DOCUMENTATION:		
(1)	9	HAS BEEN PROVIDED TODAY		
(2)	9	CANNOT BE PROVIDED BY THE REQUEST	TED DATE BUT WILL	BE MADE AVAILABLE BY:
(3)	9	AND IN MY OPINION, ITEM(S) INFORMATION AS DEFINED IN 364.183, 364 CONFIDENTIAL HANDLING OF THIS MATER 21 DAYS AFTER THE AUDIT EXIT CONFER CLASSIFICATION WITH THE DIVISION OF T SERVICES. REFER TO RULE 25-22.006, F.J	6.093, OR 367.156, I RIAL. THE UTILITY ENCE, FILE A REQU THE COMMISSION (F.S. TO MAINTAIN CONTINUED OR OTHER PERSON MUST, WITHIN JEST FOR CONFIDENTIAL
(4)	9	THE ITEM WILL NOT BE PROVIDED. (SEE	ATTACHED MEMOF	RANDUM)
istribution:	SOURCE	ASTUDICA , SIGNATURE AND Utility (for completion and return to Auditor)	D TITLE OF RESPON Copy: Audit File	NDENT) 10-14

FLORIL A PUBLIC SERVICE COMMIL JONI AUDIT DOCUMENT/RECORD REQUES NOTICE OF INTENT Docket No. 080065-TX Exhibit IT-2 (Page 52 o Non-Confidential Porti-

Docket No. 080065-TX Exhibit 1T-2 (Page 52 of 128) Non-Confidential Portion of Audit Work Paper

TO: Stan	1 Efferding	UTILITY: Vilaire Communications, Inc
AUDIT MAN	IAGER: Intesar Terkawi	PREPAREDIntesar Terkawi, 407-327-9364, 679 Blenheim LoopBY:Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST	NUMBER: 15	DATE OF REQUEST: October 03, 2007
AUDIT PURI	POSE: USF Audit Audit Control No.	07-250-1-2
REQUEST T	THE FOLLOWING ITEM(S) BE PROVIDED	BY: October 08, 2007
REFERENCE	RULE 25-22.006, F.A.C., THIS REQUEST IS N	MADE: 9 INCIDENT TO AN INQUIRY × OUTSIDE OF AN INQUIRY
Please pr services.	ovide a list of VCI customers that are serve	d through resale of another Carrier's
Thanks.		
1		
TO: AUDIT MANA	GER	DATE
THE REQUESTED	D RECORD OR DOCUMENTATION:	
(1)	9 HAS BEEN PROVIDED TODAY	
(2)	9 CANNOT BE PROVIDED BY THE REQUESTED	D DATE BUT WILL BE MADE AVAILABLE BY:
(3) 9	INFORMATION AS DEFINED IN 364.183, 366.0 CONFIDENTIAL HANDLING OF THIS MATERIA 21 DAYS AFTER THE AUDIT EXIT CONFEREN	E COMMISSION CLERK AND ADMINISTRATIVE
(4) 9	THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMORANDUM)
COLLE	CE AS INDICALED (SIGNATURE AND TI	ITLE OF RESPONDENT) $) \cup -] S$
	Driginal: Utility (for completion and return to Auditor) Co	

FLOF JA PUBLIC SERVICE COMM. SION AUDIT DOCUMENT/RECORD REQUE NOTICE OF INTENT

Docket No. 080065-TX Exhibit IT-2 (Page 53 of 128) Non-Confidential Portion of Audit Work Papers

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TO: S	tan Efferd	ling	UTILITY:	Vilaire Communications, Inc
AUDIT M	ANAGER	: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUES		R: 16	DATE OF RE	QUEST: October 17, 2007
	URPOSE:	USF Audit Audit Control No.	07-250-1-2	
REQUES	T THE FO	DLLOWING ITEM(S) BE PROVIDED	BY: Octobe	er 22, 2007
REFEREN		25-22.006, F.A.C., THIS REQUEST IS)N:		NCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY
Decen Teleco In the an inco Please Ledge	nber 31, 2 ommunica G/I, provic ome of \$2 e reconcile r included	latory Assessment Fee) return filed v 006, the company reported revenue tions Companies of \$47,320. led to audit staff in response to Docu 25,345 for the last six months of the the GL provided to the RAF. Are the on the RAF? Include detail describ both the RAF and the General Ledge	of \$64,448.30, iment Request year 2006. e revenues pre ing the type of	less amounts paid to Other No.1, the company reported sented in the provided General revenue and the amounts
TO: AUDIT M	ANAGER		DATE	
	STED RECO	RD OR DOCUMENTATION:		
(1)		HAS BEEN PROVIDED TODAY		
(2)		CANNOT BE PROVIDED BY THE REQUESTED	D DATE BUT WILL	BE MADE AVAILABLE BY:
(3)		AND IN MY OPINION, ITEM(S) IS INFORMATION AS DEFINED IN 364.183, 366.0 CONFIDENTIAL HANDLING OF THIS MATERIA 21 DAYS AFTER THE AUDIT EXIT CONFEREN CLASSIFICATION WITH THE DIVISION OF TH SERVICES. REFER TO RULE 25-22.006, F.A.0)93, OR 367.156, F AL. THE UTILITY (NCE, FILE A REQU E COMMISSION C	S. TO MAINTAIN CONTINUED OR OTHER PERSON MUST, WITHIN EST FOR CONFIDENTIAL
(4)	· م	THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMOR	ANDUM)
SC	JURCE A	studicated (SIGNATURE AND T	ITLE OF RESPON	DENT)

FLOK	A PUBLIC SERVICE COMM 310)N
AUDI	T DOCUMENT/RECORD REQUES	+ Docket N
	NOTICE OF INTENT	Exhibit I Non-Con

Docket No. 080065-TX Exhibit IT-2 (Page 54 of 128) Non-Confidential Portion of Audit Work Paper

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TO: S	tan Efferdir	ng		UTILITY:	Vilaire Communications, Inc
AUDIT M	ANAGER:	Intesar Terka	awi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUES	TNUMBER	R: 17		DATE OF RE	QUEST: October 17, 2007
AUDIT PL	JRPOSE:	USF Audit	Audit Control No.	07-250-1-2	
REQUES	T THE FOL	LOWING ITEN	M(S) BE PROVIDED	BY: Octobe	er 22, 2007
	CE RULE 2		., THIS REQUEST IS I		INCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY
Please 2007.	e provide th	e USF Data Co	ollection Forms for th	e period from	June 1 st , 2006 until June 30 th
O: AUDIT MA	ANAGER			DATE	
HE REQUES		OR DOCUMENTA	ATION:		
(1)	о н	AS BEEN PROVID	ED TODAY		
(2)	• C/	ANNOT BE PROVID	DED BY THE REQUESTED	DATE BUT WILL	BE MADE AVAILABLE BY:
(3)	IN CC 21 CL	AND IN MY OPINION, ITEM(S) IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.			
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AUDI	T DOCUME	NT/RECO	RD REQL	JEST
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NOTICE OF IN	ITENT	Docket No. 080065-TX Exhibit IT-2 (Page 55 of 128)		
TO: Stan Efferding	UTILITY:	Non-Confidential Portion of Audit Work Pape		
AUDIT MANAGER: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us		
REQUEST NUMBER: 18	DATE OF RE	EQUEST: October 17, 2007		
AUDIT PURPOSE: USF Audit Audit Control No.	07-250-1-2			
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED BY: October 22, 2007				
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS I		INCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY		
ITEM DESCRIPTION:				

- 1. Please list the customers that utilized resold lines from June 1st, 2006 until June 30th 2007.
- 2. Please provide a detailed description of any money *attributable to resale of lines, or access fees or any reimbursement,* the company received from another carrier for the period from June 1st, 2006 until June 30th 2007. Please segregate the monies by carrier and month.

TO: AUDIT MANAGER

DATE

THE REQUESTED RECORD OR DOCUMENTATION:

(1) 🗆		HAS BEEN	PROVIDED	TODAY
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(2) CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY:

(3) AND IN MY OPINION, ITEM(S)______ IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.

(4) THE ITEM WILL NOT BE PROVIDED. (SEE ATTACHED MEMORANDUM)

10-15 SOURCE (SIGNATURE AND TITLE OF RESPONDENT) Distribution: Original: Utility (for completion and return to Auditor) Copy: Audit File

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Exhibit IT-2 (Page 56 of 128) per

				Non-Confidential Portion of Audit Work P
TO: 5	Stan Effei	rding	UTILITY:	Vilaire Communications, Inc
AUDIT N	IANAGE	R: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUES	ST NUME	BER: 19	DATE OF RE	EQUEST: October 17, 2007
AUDIT P	URPOSE	E: USF Audit Audit Control No.	07-250-1-2	
REQUES	ST THE F	OLLOWING ITEM(S) BE PROVIDED	BY: Octob	er 22, 2007
REFEREN		E 25-22.006, F.A.C., THIS REQUEST IS		INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
recurri service increm Also ir	ing costs es, does nental co n your res	s. Please explain in details detail what . i.e. does it include joint and common it include equipment costs, Please be sts were derived. sponse to document request No. 14, y are using, or do you deal with anothe	i costs, such a very specific, rou provided th	s overhead and costs for and explain how the ne tariff of one carrier, is he the
TO: AUDIT M	ANAGER		DATE	
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FLOR JA PUBLIC SERVICE COMM. SION AUDIT DOCUMENT/RECORD REQUEST

alect No. 080065-TX ape

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		NOTICE OF I	NTENT	Docket No. 080003-17 Exhibit IT-2 (Page 57 of 128) Non-Confidential Portion of Audit Work P
<u>TO:</u> 5	Stan Efferdir	ng	UTILITY:	Vilaire Communications, Inc
AUDIT N	IANAGER:	Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUES		R: 20	DATE OF RE	EQUEST: October 18, 2007
AUDIT P	URPOSE:	USF Audit Audit Control No.	07-250-1-2	
REQUES	T THE FOL	LOWING ITEM(S) BE PROVIDED	BY: Octob	er 22, 2007
	ICE RULE 2 SCRIPTION	5-22.006, F.A.C., THIS REQUEST IS		INCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY
Please until J	e reconcile t une 30 th , 20	the advertisement costs to Genera	I Ledger for the	e period from June 1 st , 2006
TO: AUDIT M	ANAGER		DATE	
THE REQUES		OR DOCUMENTATION:		
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(4)	o TH	IE ITEM WILL NOT BE PROVIDED. (SEE A	TTACHED MEMOR	ANDUM)
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		AUDIT DOCUMENT/REC NOTICE OF I	-	N
TO:	Stan Effei		UTILITY:	Vilabe Communications, Inc
AUDIT	MANAGEI	R: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUE	ST NUME	BER: 21	DATE OF R	EQUEST: October 18, 2007
AUDIT F	PURPOSE	USF Audit Audit Control No.	07-250-1-2	
REQUE	ST THE F	OLLOWING ITEM(S) BE PROVIDED	BY: Octob	er 22, 2007
	NCE RULE	E 25-22.006, F.A.C., THIS REQUEST IS		INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
TO: AUDIT N	MANAGER		DATE	
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TO: Sta	an Efferdi	ng	UTILITY:	Vilaire Communications, Inc
AUDIT MA	NAGER:	Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST	NUMBE	R: 22	DATE OF RE	EQUEST: October 18, 2007
AUDIT PU	RPOSE:	USF Audit Audit Control No.	07-250-1-2	
REQUEST	THE FO	LLOWING ITEM(S) BE PROVIDED	BY: Octob	er 22, 2007
		25-22.006, F.A.C., THIS REQUEST IS I		INCIDENT TO AN INQUIRY OUTSIDE OF AN INQUIRY
TO: AUDIT MAN	AGER		DATE	
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		FLOR A PUBLIC SERVI AUDIT DOCUMENT/REC NOTICE OF IN	ORD REQU	Desket No. 080065-TX	
TO	54	alia a		Exhibit IT-2 (Page 60 of 128) Non-Confidential Portion of Audit Work Pap	
TO: St	an Effer	aing	UTILITY:	Vilaire communications, Inc	
AUDIT MA	NAGE	R: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us	
REQUES		ER: 23	DATE OF RE	QUEST: October 18, 2007	
AUDIT PU	RPOSE	USF Audit Audit Control No.	07-250-1-2		
REQUEST	THE F	OLLOWING ITEM(S) BE PROVIDED	BY: Octobe	er 23, 2007	
REFERENC		25-22.006, F.A.C., THIS REQUEST IS N		NCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY	
TO: AUDIT MA	NAGER		DATE		
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(4)		THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMOR	andum) 10-23	
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SOURCE	AS Indicated (SIGNATURE AN	D TITLE OF RESPONDENT)
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NOTICE OF INTENT	Docket Exhibit
	N. C.

No. 080065-TX 'ape

		NOTICE OF I	NTENT	Exhibit IT-2 (Page 61 of 128) Non-Confidential Portion of Audit Work Pa
TO: Sta	an Effero	ding	UTILITY:	Vilaire Communications, Inc
AUDIT MA	NAGEF	2: Intesar Terkawi	PREPARED BY:	Intesar Terkawi, 407-327-9364, 679 Blenheim Loop Winter Springs, FL 32708 iterkawi@psc.state.fl.us
REQUEST	NUMB	ER: 24	DATE OF RE	EQUEST: October 22, 2007
	RPOSE	USF Audit Audit Control No.	07-250-1-2	
REQUEST	THE FO	OLLOWING ITEM(S) BE PROVIDED	BY: Octob	er 25, 2007
REFERENC	E RULE	25-22.006, F.A.C., THIS REQUEST IS		INCIDENT TO AN INQUIRY DUTSIDE OF AN INQUIRY
ITEM DES	CRIPTIC	DN:		
	Please p ns.	e to document request No. 2, the cor provide the detailed documentation to		
	NAGER		DATE	
THE REQUEST	ED RECO	RD OR DOCUMENTATION:		
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TO: Stan Efferding	UTILITY: Vilaire Communications, Inc					
AUDIT MANAGER: Intesar Terkawi	PREPARED Intesar Terkawi, 407-327-9364, 679 Blenheim Loop BY: Winter Springs, FL 32708 iterkawi@psc.state.fl.us					
REQUEST NUMBER: 25	DATE OF REQUEST: October 25, 2007					
AUDIT PURPOSE: USF Audit Audit Control No.	07-250-1-2					
REQUEST THE FOLLOWING ITEM(S) BE PROVIDED	BY: October 29, 2007					
REFERENCE RULE 25-22.006, F.A.C., THIS REQUEST IS I	MADE: INCIDENT TO AN INQUIRY x OUTSIDE OF AN INQUIRY					
 Please explain whether the toll limited service is actually being selected by a particular low income customer or is being required by the Carrier. Please provide the support for either answer. Thanks. 						
TO: AUDIT MANAGER	DATE					
THE REQUESTED RECORD OR DOCUMENTATION:						
(1) D HAS BEEN PROVIDED TODAY						
(2) CANNOT BE PROVIDED BY THE REQUESTED	CANNOT BE PROVIDED BY THE REQUESTED DATE BUT WILL BE MADE AVAILABLE BY:					
CONFIDENTIAL HANDLING OF THIS MATERIA 21 DAYS AFTER THE AUDIT EXIT CONFEREN CLASSIFICATION WITH THE DIVISION OF TH	AND IN MY OPINION, ITEM(S) IS (ARE) PROPRIETARY AND CONFIDENTIAL BUSINESS INFORMATION AS DEFINED IN 364.183, 366.093, OR 367.156, F.S. TO MAINTAIN CONTINUED CONFIDENTIAL HANDLING OF THIS MATERIAL. THE UTILITY OR OTHER PERSON MUST, WITHIN 21 DAYS AFTER THE AUDIT EXIT CONFERENCE, FILE A REQUEST FOR CONFIDENTIAL CLASSIFICATION WITH THE DIVISION OF THE COMMISSION CLERK AND ADMINISTRATIVE SERVICES. REFER TO RULE 25-22.006, F.A.C.					
(4) THE ITEM WILL NOT BE PROVIDED. (SEE AT	TACHED MEMORANDUM)					
SOURCE AS INDICATION (SIGNATURE AND T	TILE OF RESPONDENT)					

Distribution:	Original: Utility (for completion and return to Auditor)	Copy: Audit File
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Docket No. 080065-TX Exhibit IT-2 (Page 63 of 128) Non-Confidential Portion of Audit Work Papers

VCI Company

P.O. Boy 9890, Lakewood, UA-98495-890, Phone: (800) 923-8378 Tax: (283) 478-6328

Via Overnight Delivery September 24, 2007

Intesar Terwaki, Auditor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850



Re: Audit Control No. 07-250-1-2 VCI Company Responses to Audit Data Requests 1 -9

Dear Ms. Terwaki:

Attached are VCI Company's ("VCI") responses to the Florida Public Service Commission's ("Commission") audit data requests made pursuant to the Commission's letter dated September 7, 2007. It is our understanding, per Denise Vandiver, that the Commission will honor VCI's request for confidential treatment of some of the data provided herewith without the necessity of a formal request or motion being filed with the Commission. Accordingly, certain documents provided as responses are filed under seal, marked "Confidential."

Please acknowledge receipt of these responses by date-stamping and returning the additional copy of this transmittal letter in the self-addressed, postage paid envelope provided for this purpose.

Questions may be directed to me.

Sincerely,

VCI Company

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description $V \subset 1$, $v \in S$ Powse

Stanley J. Johnson, President SOURCE

1. Please provide a list of names, addresses, account number, and phone numbers for the customers reported on the form FCC497 for the period from June 1st 2006 until June 30th 2007.

<u>Response</u>: See Attachment A. VCI requests confidential treatment of the data provided in Attachment A. Accordingly, this information is filed under seal, marked "Confidential"

2. Please provide the billing system and the G/L that support the amounts stated in the forms FCC 497 for the period from June 1st 2006 until June 30th 2007.

<u>Response</u>: VCI requests confidential treatment of documents provided in response hereto. This information is provided as part of Confidential Attachment A.

Audit Request No. 2



1. Please provide the following forms that were filed with the FCC for the period from June 1st 2006 until June 30th 2007: Form 497, Form 499-Q, and form 499A.

<u>Response</u>: See Attachment B. VCI requests confidential treatment of Forms 499A and 499Q. Accordingly, forms 499A and 499Q are filed under seal and marked "Confidential."

2. Please provide the annual filings and correspondence that was filed with USAC for the period ended June 30th 2007.

<u>Response</u>: VCI's forms 499A are provided as part of Attachment B. VCI did not file any correspondence with USAC during the period ended June 30, 2007. VCI makes no annual filings to USAC.

3. Please provide the annual filings that were filed with NECA.

<u>Response</u>: VCI is not required to make filings with NECA. VCI files its form 499s with the Federal Communications Commission on-line.

Vilaire Communications, Inc. Control No. 07-250-1-2 Phone Audit Control No. 07-250-From June 1st, 2006 - June 30th, 2007 From June 1st, 2000 - June Join, 2007 Description VCI response to Decima 2 Secretar SOURCE

1. Please provide documentation to support your advertisements for your Services as supported by the Federal Universal Service Support Mechanisms for the period from June 1st 2006 until June 30th 2007.

<u>Response</u>: See documents provided as Attachment C. VCI requests confidential treatment of the data provided as Attachment C. Accordingly, the documents are filed under seal, marked "Confidential."

Audit Request No. 4

1. Please provide proper documents showing that you allow your subscribers 60 days following the date of impending termination when you have the basis to believe that the subscriber does not meet the life-ling qualifying criteria.

<u>Response</u>: See VCI's policy provided as Attachment D.

Audit Request No. 5

1. Please provide a copy of any commercial agreement you have with another carrier in Florida.

<u>Response</u>: VCI is working with BellSouth to provide a copy of this Agreement as requested and will do so as soon as possible. VCI will request confidential treatment of this document.

Audit Request No. 6



1. Please provide an explanation for the difference in TLS support collected by your company versus the TLS amount collected by other carriers like Verizon, AT&T and Embarq.

<u>Response</u>: As VCI is not privy to the marketing and customer service practices of any other company, VCI can only respond as to why its customers subscribe to toll limitation service in large numbers. As its response to this data request, VCI refers the Commission to its response to the Commission's May 4, 2007 letter regarding toll limitation service, attached hereto as Attachment E.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCLY CSPONSA SOURCE_

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1. Please provide a detailed explanation for the reason of discontinuing the service in the states of Oregon and Washington, and the investigation your company received into the Low Income Support programs in these two states or any other states.

Response:

- A. The reason why VCI discontinued service in Oregon and Washington may be found in VCI's Section 63.71 application filed with the FCC, which is attached as Attachment F hereto.
- B. VCI is currently the subject of an investigation by the Public Utilities Commission of Oregon only. The issue in the Oregon Investigation, Docket No. 1288, is whether VCI and Qwest Communications, Inc. inadvertently requested reimbursement from the Oregon Telephone Assistance Plan ("OTAP") for the same low-income lines. To date, the investigation in Docket No. UM 1288 is ongoing and no orders have been issued.



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Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VC1 VIII Program Description



1. 1.11

- 1. Please provide a description of the following steps regarding the Low-Income Support Program:
 - a. The application process for subscribers.
 - b. How the subscriber becomes aware of Lifeline program.
 - c. How your company becomes aware of subscribers (upon application, qualifying agency notification, etc.)
 - d. Procedures for determining ineligible customers.

Response:

a. The application process for subscribers.

Florida consumers submit forms to the Company certifying, under penalty of perjury, that the consumer participates in one or more approved lowincome programs. In addition, consumers may apply on-line at the Florida Public Service Commission. The Commission informs VCI that an on-line application is available and the company logs in to the Commission's web site to download the application.

b. How the subscriber becomes aware of the Lifeline program.

VCI advertises the availability and rates of its Lifeline program via television advertisements throughout its designated service area. (See Attachment A). Interested consumers then contact the company via the company's toll free telephone number, 800-932-8375, and speak to customer service representatives who describe the program, ensure that the customer participates in an eligible program, and advise the customer to submit a self-certification form. As stated above, consumers may also become aware of the Lifeline program and make application through the Commission's web site. Consumers also become aware of the Lifeline program through the Office of Public Counsel, which verifies consumers' income eligibility.

c. How our company becomes aware of subscribers.

The company becomes aware of subscribers when consumers contact the company via its toll free telephone number or make application through the Commission's web site.

d. Procedures for determining ineligible customers.

The customer is ineligible if the customer fails to submit the selfcertification form signed under penalty of perjury. The company will determine eligibility through the annual survey verifying continued eligibility for Lifeline service. A consumer is not eligible for Link-Up service when the customer switches service from another carrier but remains at the same address.



Docket No. 080065-TX Exhibit IT-2 (Page 68 of 128) Non-Confidential Portion of Audit Work Papers

Audit Request No. 9

- 1. Please provide a list of customers' names, account number, phone numbers, addresses, that are served by your own facilities.

Response: VCI provides service to its customers via a combination of resale and facilities as permitted by the FCC. Some customers are served utilizing unbundled network elements leased from BellSouth.

VCI offers all of its customers access to Directory Assistance via the company's own facilities. The FCC has determined that a carrier may provide one of the nine supported services on a facilities basis and the rest via resale. (See *In the Matter of Federal-State Joint Board on Universal Service*, Report and Order, FCC 97-157, 12 FCC Rcd 8776, 8871, para. 169. (CC Docket 96-45, rel. May 8, 1997). Access to directory assistance is one of the nine services supported by universal service. Thus, all of VCI's customers are served via the company's own facilities. The remaining eight supported services are provided via resale of BellSouth's services.

A list of all of VCI's Florida customers served in August 2007 is attached as Attachment G. Company requests confidential treatment of Exhibit G, which is filed under seal, marked "Confidential."

2. Please provide a list of customers' names, account number, phone numbers, addresses that are served through network elements of another underlying Carrier.

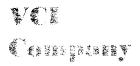
Response: VCI does not know if any of its customers are served through network elements of another underlying carrier.

3. Please provide a list of customer's names, account numbers, phone numbers, addresses, that are served through resale of another Carrier's services.

Response: See No. 1 above.

SOURCE

Docket No. 080065-TX Exhibit IT-2 (Page 69 of 128) Non-Confidential Portion of Audit Work Papers



170) - Roy 9890 Lakerood - (1 - 198496 890) - Pho R² - 8000 923 - 8355 - July (233) 178 6328

Via Overnight Delivery

October 8, 2007

Intesar Terkawi, Auditor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Audit Control No. 07-250-1-2 VCI Company Responses to Audit Data Requests 11-15

Dear Ms. Terkawi:

VCI Company responds to the Commission's audit data requests, nos. 11-15, as set forth in the attached pages.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage paid envelope provided for this purpose.

Questions regarding this filing may be directed to me at (253) 973-2476 or stanj@vilaire.com.

Sincerely,

V&I Company ohnson ev President

SOURC

Enclosures

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Florida Public Service Commission Division of RCA





Vil. Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

Request No. 11

Docket No. 080005-1 N Exhibit 1T-2 (Page 70 of 128) Non-Confidential Portion of Audit Work Papers

1. In your answer to document request No.3 you provided a program log from each WCWJ-TV, WBFS-TV, and WSFL-TV, Please provide two invoices for the months of November 2006, January 2007, and May 2007 from each of the broadcasting station.

Response: The documents provided as Attachment C, Response to Audit Request No. 3, consist of all of the invoices VCI received from the television stations where VCI's commercials were aired and constitute the only invoice documents received by VCI from these stations. Each document indicates at the top of the document's page that it is an invoice and contains additional information about scheduling times purchased from the station.

Examples of each of the documents you request above are included in Attachment C as follows:

<u>Station</u>	Broadcast Month	Invoice Date	<u>Invoice Number</u>	
WCWJ-TV	November, 2006	11/26/06	61110240	
WBFS-TV	November, 2006	11/26/06	8161-432206 (2 pp.)	
WSFL-TV	November, 2006	11/26/06	61110192	
WCWJ-TV	January, 2007	1/28/07	70110194	
BSFS-TV	January, 2007	1/28/07	8161-433521 (2 pp.)	
WSFL-TV	January 2007	1/17/07	70110084	
WSFL-TV	January 2007	1/28/07	70110399	
WCWJ-TV	May 2007	5/27/07	70510226	
WBFS-TV	May 2007	5/27/07	8161-436129 (2 pp.)	
WSFL-TV	May 2007	5/09/07	70510051	
WSFL-TV	May 2007	5/16/07	70510105	
WSFL-TV	May 2007	5/21/07	70510166	

2. Please provide the text that was used by each station to advertise your services to the public.

Response: VCI's Florida commercial can be accessed in digital format at http://vipstudios.tv/vciflorida.htm.

SOURCE__

1. Please provide a detailed walk-through regarding your reporting procedure to USAC.

VCI draws customer data for its reports to USAC directly from its computer system. VCI inputs a query into its system requesting the compilation of information needed on forms FCC 497.

2. Please provide documentation that was used to compile the filing for Universal Service Reimbursement.

As the information is drawn directly from VCI's computer system, no documentation is generated other than the forms FCC 497 itself.

Request No. 13

1. Please provide the applicable monthly bill for each customer on the attached lists

Response: The requested monthly bills are attached as Attachment A-1, in a sealed envelope marked "Confidential." VCI requests confidential treatment of the information submitted as Attachment A-2.

Request No. 14

1. In the Toll Limitation Services (TLS) section of the form FCC 497, there is an amount of \$10.94 for the month of June 2006, an amount of \$8.006503 for the month of July 2006, and an amount of \$4.368223 for the month of May 2007, please provide the details and source of these numbers that make up the above stated amounts for these three stated months.

Response: The numbers present on the form FCC 497 consist of VCI's incremental cost of providing TLS. The figure is calculated as demonstrated in Attachment A-2, which is filed herewith under seal. Also attached is a copy of BellSouth's tariff page stating the cost of TLS. VCI requests confidential treatment of the information provided as Attachment B-2.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description $V \leq \int V \leq f(r, r) \leq r$. Decement $\int f(r) = \int V \int V = \int V \int V = \int V$



1. Please provide a list of VCI customers that are served through resale of another Carrier's services.

Response: As stated in VCI's response to Request No. 9, VCI provides the nine services supported by Universal Service using a combination of its own facilities and resale of BellSouth's services, as is permitted by the FCC order cited in that response. VCI offers access to directory assistance service through its own facilities and offers the remaining eight services supported by Universal Service (e.g., access to operator services, toll limitation, etc.) via resale of BellSouth's services. *None of VCI's Florida customers are served exclusively through resale of BellSouth's services*. Because VCI provides all of its customers the nine universal service supported services via combination of its own facilities and resale of BellSouth's services, VCI correctly provided the Commission with a list of all customers served in August, 2007 in Attachment G to Audit Request No. 9.







Docket No. 080065-TX Exhibit 1T-2 (Page 73 of 128) Non-Confidential Portion of Audit Work Papers

Please provide the USF Data Collection Forms for the period from June 1st, 2006 until June 30th 2007.

Response: To VCI's knowledge, VCI is not required to prepare any document entitled "USF Data Collection Form." Only carriers requesting high-cost support from the USAC are required to do so. VCI does not request high-cost support.

Vilaire Communications, Inc. Control No. 07-250-1-2 Phone Audit From June 1st, 2006 - June 30th, 2007 Description VCJ v CSP mark (1) Nove of the second of 197 11 4 4

SOURCE_

Request No. 18.

- a. Please list the customers that utilized resold lines from June 1st, 2006 until June 30th 2007.
- b. Please provide a detailed description of any money attributable to resale of lines, or access fees or any reimbursement, the company received from another carrier for the period from June 1st, 2006 until June 30th 2007. Please segregate the monies by carrier and month.
- Response: VCI does not receive monies from its underlying carrier, BellSouth, for resale of Lifeline service. VCI receives a resale discount of 21.83% off of BellSouth's tariffed rate for basic local exchange service.



SOURCE_



In the company response to document request No. 9, the customers names, addresses, phone numbers were listed. Please affirm if these customers are single line, or multi-line business and residential in the State of Florida.

Response: All customers are single line, residential customers.



Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCJ responses Decommend Request 45 23 14 11/07





Please explain the mechanism that the company uses to determine the customers eligibility for LifeLine and LinkUp Programs.

Response: Customers contact VCI via its toll-free telephone number, 800-923-8375, and VCI's customer service representatives review the rules for Lifeline and Link Up service with the customer, confirm that the customer is a participant in an eligible program and confirm whether the customer is eligible for Link-Up service at the customer's current address. The Customer must execute and return to the company a self-certification form in which the customer certifies, under penalty of perjury, that the customer participates in one of the Lifeline and/or Link-Up eligible programs.



Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCIVES panse 1. Document 1 from the const 1. 11 20





VCI Cobene pitery

P.O. Box 98907 Lakewood, 11/A 98496-8907 Phone: (800) 923-8375 Fax: (253) -175-6328

Via Electronic Mail

November 5, 2007

Intesar Terkawi, Auditor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850



Audit Control No. 07-250-1-2 Re: VCI Company Response to Audit Request No. 24

Dear Ms. Terkawi:

VCI Company ("VCI") responds to the Commission's Audit Request no. 24 as set forth in the attached page.

Please acknowledge receipt of this filing by return electronic mail.

Questions regarding this filing may be directed to me at (253) 973-2476 or stanj@vcicompany.com.

Sincerely, Compan Aøhnson

President

Enclosure

SSOURCE.

Audit Request No. 24:

In your response to document request No. 2, the company provided the FCC Forms 499-Q, and 499-A. Please provide the detailed documentation to support the dollar amounts shown on these two forms.

- Response: VCI cannot comply with this request. As is explained below, data reported on FCC Forms 499Q and 499A are comprised of aggregate figures, including data from all states in which VCI provides service. Forms 499Q and 499A do not provide for the reporting of data on a state-by-state basis.
- 1. Carriers file FCC Forms 499-Q¹ quarterly. On FCC Form 499Q, carriers report gross revenues from all sources, which consist of total revenues billed to customers during the filing period with no allowances for uncollectibles, settlements, or out of period adjustments.² Carriers are required to report total historical gross billed revenues for the reporting period as well as projected gross billed revenues for interstate and international telecommunications services. Carriers report data in the aggregate for each reporting period. FCC Form 499-Q does not provide for reporting of data on a per state basis. Florida 2006 gross billed revenues are included in the aggregated data reported on FCC Forms 499-Q filed by VCI in the 3rd and 4th quarters of 2006.
- 2. Carriers file FCC Forms 499A annually on or about April 1.³ On FCC Form 499A, carriers report gross revenues from all sources, consisting of total revenues billed to customers during the filing period with no allowances for uncollectibles, settlements or out-of-period adjustments.⁴ Universal service support revenues received from Federal or state sources are reported on line 308 of FCC Form 499A. Carriers are also permitted to subtract their uncollectible revenues, consisting of the portion of gross billed revenues that the carrier reasonably expects will not be collected.⁵ Carriers report FCC Form 499A data in the aggregate. Form 499A does not provide for gross billed revenues, uncollectibles, or universal service support to be reported on a per state basis. 2006 Florida gross billed revenues, uncollectibles, as well as federal universal service support for revenues foregone from providing Lifeline and Link-Up service to eligible Florida consumers, are included in the aggregate amounts reported by VCI on Form 499-A filed in April 2007.



⁵ Instructions for FCC Form 499A, page 30, Line 421.



¹ A blank form with instructions is accessible on the FCC's website at <u>http://www.fcc.gov/Forms/Form499-</u> <u>Q/499q.pdf</u>

² Instructions to FCC Form 499-Q, page 13, section 2.

³ A blank form with instructions is accessible on the FCC's website at <u>http://www.fcc.gov/Forms/Form499-</u> <u>A/499a.pdf</u>

⁴ Instructions to FCC Form 499A, page 19, section 2.

VCH Composery

Docket No. 080065-TX Exhibit IT-2 (Page 79 of 128) Non-Confidential Portion of Audit Work Papers

> 1.0. Box 98907 Failent oud. (1)4–98496-8907 Phone: (800) 923-8375 Hax: (253) 475-6328

Via Overnight Delivery

October 22, 2007

Intesar Terkawi, Auditor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850



Re: Audit Control No. 07-250-1-2 VCI Company Responses to Audit Requests 16-23

Dear Ms. Terkawi:

VCI Company ("VCI") responds to the Commission's Audit Requests, nos. 16-23, as set forth in the attached pages. VCI requests confidential treatment of its Responses to Audit Request Nos. 16, 19, and 20. Accordingly, these responses are attached under seal, marked "Confidential."

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage paid envelope provided for this purpose.

Questions regarding this filing may be directed to me at (253) 973-2476 or stanj@vilaire.com.

Sincerely,

VÇI Company Xn ohnson President

Enclosures





CONFRONTENT DOCUMENT RELATESTICION Company Nam Vilaire Communications, Inc. (VCI)

Docket No: Undocketed

Audit Purpose: Providing Accurate Data to USF

Date: 10/22/2007 Audit Control No. 07-250-1-2

	Document Description		f Material				1	Dis	position of [Material		1
		1	Document		Received	Date	Returned	Returned	Date	Received	Workpaper	Page No.
Item No	Description	of Pages	Request #	From	By	Received	to	By	Returned	By	Locator	Retained
				•			·			1		1
	Names, phone numbers, addresses, of	1.172		Stanley J.	Intesar		Stanley J.	Lynn	·			
l	lifeline and linkup customers.	pages	1	Johnson	Terkawi	9/26/2007	Johnson	Deamer				
				Stanley J.	Intesar							
2	Forms 499Q and 499A	12	2	Johnson	Terkawi	9/26/2007					19 & 20 Series	1
		1442 and										12 Pages
		1.126 KB		Stanley J.	Intesar						15-1to 15-44	and 1,12
3	Advertsement Bills and a disk	disk	3	Johnson	Terkawi	9/26/2007					and 15-47	KB disk
		1,988 KB		Stanley J.	Intesar							
4	Commercial Agreements	disk	5	Johnson	Terkawi	9/26/2007					10-5/1	2010KB
	Name of customers served by the										10 2.71	Lorono
	company's facilities, another underlying			Stanley J.	Intesar		Stanley J.	Lynn				
5	carrier, resale of another carrier.	90	9	Johnson	Terkawi	9/26/2007	Johnson	Deamer				
		106,573		Stanley J.	Intesar							106,573
6	Names of the customers electronically	КВ	10	Johnson	Terkawi	9/26/2007					10-10/1	KB disk
				Stanley J.	Intesar						10-10-1	IND UISK
7	Customers Bills for LifeLine Program	67		Johnson	Terkawi	9/26/2007					23 -23-66	6
				Stanley J.	Intesar	512012001					23-23-00	
8	Customers Bills for LinkUp Program	67		Johnson	Terkawi	9/26/2007					23/1 to 23/67	6712
				Stanley J.	Intesar	5.20,2007					23.1 10 23/07	10 14
9	Support for RAF	3		Johnson	Terkawi	10/24/2007					1614 163	
				Stanley J.	Intesar	10.24.2007		· · · · ·			16-1 to 16-3	
10	TLS Details	4	19	Johnson	Terkawi	10/24/2007					24 24 2	
	Reconciliation of Advertisement costs to			Stanley J.	Intesar	10.24/2007					26-26-3	
11	G/L	1	20	Johnson	Terkawi	10.24/2007					15 44	
				Prepared by		10 21/2007					15-46	───
12	Details of Advertisement Bills	1		auditor							15	
	Schedule of duplicate customers of LinkUp			Prepared by							15	<u> </u>
13	program for the audit period	17		auditor							22 += 22.14	
	Schedule of duplicate customers of LinkUp			Prepared by			· · ·				22 to 22-16	+
14	program per month for the audit period	149		auditor							22 149	1-19
					·							
				·		······································						
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Docket No. 080065-TX Exhibit IT-2 (Page 80 of 128) Non-Confidential Portion of Audit Work Papers

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Docket No. 080065-TX Exhibit IT-2 (Page 81 of 128) Non-Confidential Portion of Audit Work Papers

'n

12:21 PM 09/28/07 Cash Basis

VCI Company Transaction Detail By Account January 2006 through July 2007

	Туре	Date	Memo	Cir Split	Original Amount	Paid Amount	Balance
4000 Sales 4041 Feds							
4041 · Feos 4058 · FL							
4030 · PL	Canada Internet	.×. العلي العلي ال					
	General Journal		Lifeline	4041 Feds	1,021.00	1,021.00	1.021
	General Journal	July	Link up	4041 Feds	3,060,00	3,060.00	4.081
	General Journal	July	TLS	4041 Feds	1,116.00	1,116.00	5,197
	General Journal	Aug	Lifeline	4041 Feds	1,651.00	1,651.00	6.848
	General Journal	Aug	Link-up	4041 Feds	3,090.00	3,090 00	9.938
	General Journal	Aug	TLS	4041 Feds	1,321.00 >	1,321 00	11 259
	General Journal	Sept	Lifeline	4041 Feds	4,681.00	4,681 00	15.940
	General Journal	Sept	Link-up	4041 Feds	4,030.00	4,030.00	19 970
	General Journal	Sept	T∟S	4041 Feds	2,483.00	2,483 00	22.453
	General Journal	Oct	Lifeline	4041 Feds	8,333.00	8,333.00	30.786
	General Journal	Oct	Link Up	4041 Feds	16,989.00	16,989.00	47.775
	General Journal	Oct	TLS	4041 Feds	7,062.00	7,062.00	54 837
	General Journal	Nov	Lifeline	4041 Feds	19,825.00	19,825.00	74,662
	General Journal	Nov	Link Up	4041 Feds	7,527.00	7,527.00	62,189
	General Journal	Nov	TLS	4041 Feds	8,162.00	8,162.00	90,351
	General Journal	Dec	Lifeline	4041 · Feds	37,839.00	37,839.00	128, 190,
	General Journal	Dec	Link Up	4041 Feds	67,689.00	67,689.00	195,879.
	General Journal	Dec	TLS	4041 Feds	29,466.00	29,466.00	225.345
	General Journal	Jan	Lifeline	4041 Feds	61,936.00	61,936.00	287 281
	General Journal	Jan	Link Up	4041 · Feds	30,845.00	30.845 00	318 126.
	General Journal	Jan	TLS	4041 Feds	38,285.00	38,285.00	356 411.
	General Journal	Feb	Lifeline	4041 Feds	79,913.00	79,913.00	436 324
	General Journal	Feb	Link Up	4041 Feds	41,400.00	41,400.00	477 724.
	General Journal	Feb	TLS	4041 Feds	35,728.00	35,728.00	513.452
	General Journal	March	Lifeline	4041 Feos	81,093.00	81,093.00	594 545.
	General Journal	March	Linkup	4041 · Feds	24,690.00	24,690.00	619 235.
	General Journal	March	TLS	4041 Feds	32,244.00	32,244.00	651 479
	General Journal	April	Lifeline	4041 Feds	71,442.00	71,442.00	722.921.
	General Journal	April	Link up	4041 Feos	33,420.00	33,420.00	756.341.
	General Journal	April	TLS	4041 Feds	27,881.00	27,681.00	784.222
	General Journal	May	Lifeline	4042 Feds	64,246.00	64,245.00	848,468
	General Journal	Мау	Link up	4043 Feds	51,378.00	51,378.00	899.645.
	General Journal	May	TLS	4044 Feds	25,353.00	25,353.00	925 199 (
	General Journal	June	Lifeline	4045 Feds	33,405.00	33,405.00	958.604
	General Journal	June	Link up	4046 Feds	4,261.00	4,261.00	962,865.0
	General Journal	June	TLS	4047 Feds	11,556.00	11,556.00	974,421.0
Total 4058 - FL						974,421.00	314.421.0
						374,427.00	
Total 4041 · Feds						974,421.00	
olai 4000 Sales						974 421 00	•
						974,421.00	
L						974,421.90	

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCI General Ledran Wort IT

this is the only OIL Frot the combon for for the recombursement on forms fcc-477. The first two months tune & July 2006 amounts reconcile to the GIL, the rest of the months do not. The months do not.



Page 1 of 1

Docket No. 080065-TX Exhibit 1T-2 (Page 82 of 128) Non-Confidential Portion of Audit Work Papers

AUDIT POINT SHEET

Company: Audit: Dkt No: Acn: Vilaire Communications Low Income Beneficiary Audit Undocketed 07-250-1-2

Auditor/ Manager: Reviewed By: Date Reviewed: Intesar Terkawi Lynn Deamer October 31, 2007

It

Point Number	Working Paper	Review Comments	Disposition	Corrected by/date
1	Admin	Remember to include: 1)cd with files 2) tick mark sheet 3) Good Index sheet!	1) Included 2) Scew P6-2 3) thanks	11/19/07
2	Binder Label	Please redo. Binder label should mirror the title page beginning with the company name and ending with the Audit control Number.	Sectabels Jone	11/14/07
3	Audit report	Make changes as noted.	Done	11/14/07
4	Asr	Good annotation! ASR 7 is nothow about annotating it to your audit report. i.e. say "see finding xx" for discussion	Dine	11/14/07
5	4 to 4-4	Initial and date	Done	11/14/-1
6	5-1,5-5-3	There are pencil markings as if you want to point out something or reference something. So Reference to other workpapers	Done	11/14/07
7	11	Workpaper 11 should be in the non confidential binder	Done	11/14/07
8	12	In your audit note, do we know why the other months don't reconcile, did we ask the company? Please include more detail. Talk to	talked to the company, seat an e-mod with usives	11/14/07
9	Confident ial vs non confidenti al	me if you need to. The only paper in your confidential binder is what is actually confidential. So, remove any other paper including the index. We (you and/or I) will create a special index for this binder. Some of your lead sheets you left in the nonconfidential binder, others you put in the confidential binder.	Done	11/19/07
10	Kangaroo pouches	The one behind wp15 has no number	See wp 15-1- 15-44	11/14/07
11	15	When you prepare a schedule from confidential material pbc, this prepared schedule should be accounted for on wp 11. Under received from/by type "prepared by audit staff"	Seewp 11	11/12/07
12	15-47	Not clear why this is confidential. Talk to me. Also, where are the cd's that the company provided? Should we include them in the workpapers??	See w P 10-3	w/w/•7
	22	The source for this really isn't pbc. It's a schedule prepared by you from cd. The first 4 columns are company's, the last is from you.	Seeup 22	11/14/07
14	23 series	Let's talk about the inclusion of wp 22 and 23.	See wp23	11/14/27
15	THE MOTOR AND A DESCRIPTION OF THE REAL			

Docket No. 080065-TX Exhibit IT-2 (Page 83 of 128) Non-Confidential Portion of Audit Work Papers



Vilarie Communications, INC. (VCI) Advertisement Twelve Month Period Ended June 30, 2007 Summary Of Work Performed

OBJECTIVE:

To verify that the company advertises for the LifeLine and LinkUp programs.

WORK PERFORMED:

15

- $1 \le -1 \le \frac{1}{2}$ (1) Obtained Monthly Bills of the company's advertisement.
- $1 \le C \le n^{1/2}$) Create a schedule that summarize the bills of advertisements for the period from June 1st, 2006 until June 30th, 2007.
 - 3) Obtain the text the company uses for advertisement.
 - 4) Not able to reconcile the amounts of the advertisements bills to the General Ledger, as the company claimed that it does not keep general ledger for each state.

CONCLUSION:

Workpaper are included. No further work performed. The auditor is not able to determine the effectiveness of the advertisements used by VCI to attract qualifying individuals.

SOURCE As Indicated

Lead 15

Florida

New Mexico



Lifeline and Link-Up for VCI Customers in Florida

Lifeline is a government program that offers qualified people a discount on their monthly local telephone bill. Each state has its own guidelines to qualify.

How much can I save on my phone bill? You will save up to \$14.50 on your basic monthly bill, including a waiver of the Subscriber Line Charge. These benefits apply to your basic local telephone service charges Lifeline customers are exempt from paying the federal Universal Service charge.

Temporary Assistance for Needy Families (TANF) Food Stamps

Medicaid

Federal Public Housing Assistance (Section 8)

Supplemental Security Income (SSI)

National School Lunch free lunch program

Low Income Home Energy Assistance Programs (LIHEAP)

Are there any restrictions? Lifeline can only be used for

5 . Ċ, UXH ACY OL SOURCE_

07-250-1-2

Communications,

How do I know if I'm eligible? You're eligible for Lifeline if you participate in any of the following programs:

content

the main telephone line in a household. The name on your phone bill must match the name of the participant who is eligible in the program. You may purchase any service available to a non-Lifeline customer.

How do I apply? To apply for Lifeline, call 800-923-8375. You will be asked to provide proof of your eligibility by returning a signed self-certification form. Applications also are available at the Florida Office of Public Counsel for Lifeline assistance by way of the State Means Test. You also may apply for Lifeline service on-line at the Florida Public Service Commission's web site, https://secure.floridapsc.com/(S (in45j355b1q0jz45f45qtguc))/public/lifeline/lifelineapplication.aspx.

How do I continue to receive Lifeline benefits?

Eligibility is reviewed periodically. Your benefits will be discontinued when you no longer meet eligibility requirements or when proof of eligibility is not received.

Other useful information. There are other options that can help you save money, including free toll blocking and the use of prepaid long distance calling cards.

Link-Up helps households pay the installation charge for telephone service. This program pays some of the cost of installing local service in your home, but Link-Up does not cover the cost of wiring inside your home.

How much will I save by using Link-Up? Link-Up will pay 50% of charges for activation of telephone service. The maximum benefit is \$30.

How do I know if I am eligible? If you qualify for Lifeline, you also qualify for Link-Up

Does Link-Up have any restrictions? It can only be used for the charges for activating main phone service or moving existing service to a new address. You must provide proof of

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June Lat, 2006 - June 30th, 2007 Description Lipe Live & Live Ad Ve v Lip event A e

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Page 2 of 3

Docket No. 080065-TX Exhibit IT-2 (Page 85 of 128) Non-Confidential Portion of Audit Work Papers

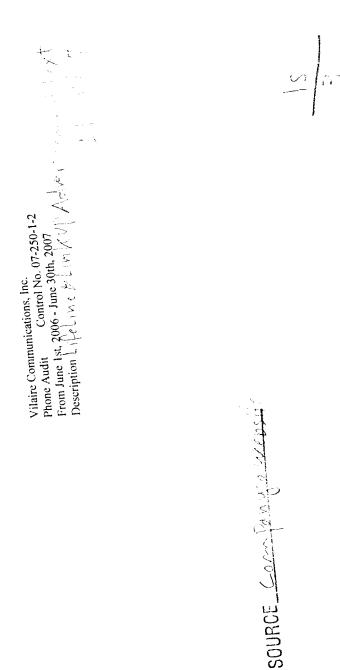
SOURCE Som P. J. J. LENDLAC

10/15/2007

content

How do I apply for Link-Up? The application process is the same as Lifeline.

Being a Lifeline or Link-Up customer does not protect you from being disconnected if you fail to pay your telephone bill.

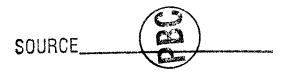


Request No. 20:

Please reconcile the advertisement costs to General Ledger for the period from June 1st, 2006 until June 30th, 2007.

Response: VCFs response to Data Request No. 20 is attached hereto under seal. VCI requests confidential treatment of its Response to this Data Request.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description Coverpaper to Document Frequent # 20 11/07 LT



Docket No. 080065-TX Exhibit IT-2 (Page 88 of 128) Non-Confidential Portion of Audit Work Papers

Vilarie Communications, INC. (VCI) VERIFICATION OF FILING WITH USAC Twelve Month Period Ended June 30, 2007 Summary Of Work Performed

÷1)

OBJECTIVE:

To examine the company's supporting documentations that were used to compile the filing for Universal Fund Reimbursement. Tie the amounts on the forms FCC 497 to the annual RAF filing with the Commission. Obtain the documents that support each of FCC Form 499-Q, FCC 499-A, USF Data Collection form, USAC Annual filing and correspondence, and NECA Annual filings.

WORK PERFORMED:

1)	Required the company to provide a walk-through reporting procedures
22	with USAC. The company uses the customer listing generated from the
	computer to compile the required data.
18-18-122)	The audit staff reconciled the number of customers on the subscribers
1	listings to the number of customers reported on the FCC 497 forms.
3)	The audit staff reconciled the amounts charged on form FCC 497 to the
4	tariff.
4)	The audit staff requested the general ledger to reconcile the amounts on
12. 4)	general ledger to the amounts reported on forms FCC-497.
5)	The audit staff requested each of the RAF, Form FCC 499Q form, and
6,19,20	FCC 499A form, USF Data Collection form, USAC Annual filing and
,	Correspondence, and NECA Annual filings.

CONCLUSION:

1

The audit staff was not able to reconcile the amounts reported on the form FCC-497 to the General Ledger, nor was able reconcile the amounts reported on the FCC Forms 497 to the revenue reported on the 2006 RAF filing with the Commission. Forms FCC 497 showed a revenue of \$234,901 for the last six months of the year 2006. Annual RAF 2006 filing shows a revenue of \$64,449. On asking the company for explanation of the difference of the reported amounts on the RAF from the ones reported on FCC 497 forms, the company failed to give a satisfactory answer (See Finding No. 2). Form FCC499-Q reported amounts are estimates and could not be reconciled to any other form. Form FCC 499-A, is an annual filing for all the states combined, it includes the actual amounts, and it could not be reconciled to any other form. According to the company response, VCI is not required to file USF Data Collection form, USAC annual filings and correspondence, or NECA annual filings.

Work paper are included in both files. No further work preformed.

TO A VOID PENALTY AND INTEREST CHARGES, THE REGL RY ASSESSMENT FEE RETURN MUST BE FILED ON OR BEFORE 01/36 Competitive Local Exchange Company Regulatory Assessment For Doturn

Florida Public Service Commission

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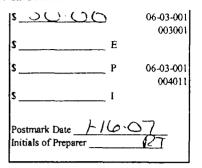
Actual Return Estimated Return Amended Return

PERIOD COVERED: 02/06/2006 TO 12/31/2006

(See Filing Instructions on Back of Form) TX868-06-0-R Vilaire Communications, Inc. P. O. Box 98907 Lakewood, WA 98498-0907

704 JAN 2 9 200

Docket No. 080065-TX Exhibit IT-2 (Page 89 of 128) Non-Confidential Portion of Audit Work Papers



Please Complete Below If Official Mailing Address Has Changed

	(Name of Company)	(A04	dress) (City	//State) (Zip)
LINE NO.	ACCOUNT CL	ASSIFICATION	FLORIDA GROSS OPERATING REVENUE	INTRASTATE REVENUE
1.	Basic Local Services		\$ 64448 BC	S
2,	Long Distance Services (IntraLAT	A only) ⁽¹⁾		·
3.	Access Services			
4.	Private Line Services			
5.	Leased Facilities & Circuits Servic	es		
6.	Miscellaneous Services			
-			· · · · · · · · · · · · · · · · · · ·	1/11/18 27:
7.	TOTAL REVENUES			<u>s 44490 - 5C</u>
8.	LESS: Amounts Paid to Other Tele	communications Companies		9732000
9.	NET INTRASTATE OPERATIN	GREVENUE for Regulatory A	ssessment Fee Calculation (Line 7 less Line 8)	\$ 1712830
10.	Regulatory Assessment Fee Due (N		,	34.74
11.	Penalty for Late Payment (see "3.1	• • •	back)	G
12.	Interest for Late Payment (see "3. F	÷		
13.	Extension Payment Fee (see "4. Ext		,	
14.	TOTAL AMOUNT DUE (\$50 MI	NIMUM		s 34.26
		CURRENT CO	Vilaire Communications, Phone Audit Control	
) Faciliti	ies-Based Provider	CURRENT CO	PMPANY ST/ Phone Audit Contro From June 1st, 2006 - Jun	l No. 07-250-1-2 e 30th, 2007
	ies-Based Provider below if billing agent is other than your	BILLING IN self.	MPANY ST / Phone Audit Contro From June 1st, 2006 - Jun Description / //	1 No. 07-250-1-2 e 30th, 2007 人、C、人、C、 い (の可
		BILLING IN self.	MPANY ST / Phone Audit Contro From June 1st, 2006 - Jun Description / /	l No. 07-250-1-2
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omplete b	velow if billing agent is other than your (Name) se telecommunications' facilities? (() Reseller () Other: BILLING IN self. (Ac COMPANY IF) YES	MPANY ST/ Phone Audit Contro From June 1st, 2006 - Jun Description (FORMATION ddress: City/State/Zip)	1 No. 07-250-1-2 e 30th, 2007 人、C (ハロン い (の内
you leas YES, who dress:	(Name) (Name) se telecommunications' facilities? (o do you lease these facilities from? No indersigned owner/officer of the abov is a true and correct statement. I am inislead a public servant in the perform (Signature of Company Official)	Keseller Other: BILLING IN self. (Ac COMPANY IF) YES (×`) NO ame: definition of the pursuant to Section 8 hance of his official duty shall be finite of the pursuant to Section 1	Impany ST/ Phone Audit Contro From June 1st, 2006 - Jun Description Description A (FORMATION) A Iddress: City/State/Zip) A NFORMATION A the foregoing and declare that to the best of 137.06, Florida Statutes, whoever knowingly me guilty of a misdemeanor of the second degree YESI CLEAT (Title)	1 No. 07-250-1-2 e 30th, 2007 Control (Control (Contro)
you leas YES, who dress: I, the u ormation intent to	(Name) (Name) se telecommunications' facilities? (o do you lease these facilities from? No undersigned owner/officer of the abov is a true and correct statement. I am is mislead a public servant in the perform	Keseller Other: BILLING IN self. (Ac COMPANY IF) YES (×`) NO ame: definition of the pursuant to Section 8 hance of his official duty shall be finite of the pursuant to Section 1	Impany ST/ Phone Audit Control From June 1st, 2006 - Jun Description Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impac	1 No. 07-250-1-2 e 30th, 2007 (-) (Telephone) my knowledge and belief the aborakes a false statement in writing with the false stat
you leas YES, who dress:	(Name) (Name) se telecommunications' facilities? (o do you lease these facilities from? No indersigned owner/officer of the abov is a true and correct statement. I am inislead a public servant in the perform (Signature of Company Official)	Keseller Other: BILLING IN self. (Ac COMPANY IF) YES (×`) NO ame: definition of the pursuant to Section 8 hance of his official duty shall be finite of the pursuant to Section 1	Impany ST/ Phone Audit Contro From June 1st, 2006 - Jun Description Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact of the second degree Impact	1 No. 07-250-1-2 e 30th, 2007 (-) (Telephone) my knowledge and belief the above akes a false statement in writing with (-)

Vilaiı	re Communications, Inc.		Florida P.S.C. Price List No. 1 3 rd Revised Sheet No. 42 Cancels 2 nd Revised Sheet No. 42
	4	.0 - <u>RATES</u>	S AND CHARGES
4.1	Basic Local Service		Docket No. 080065-TX Exhibit IT-2 (Page 90 of 128) Non-Confidential Portion of Audit Work Paper
4.1.1.	Retail Service:	<u>Monthly</u>	Rate Non-recurring Charge
	Installation of Local Line Conversion of Local Line Basic Monthly Service	\$ 29.99	\$ 300.00 \$ 300.00
4.1.2	Lifeline Service:		
	Installation of Local Line Conversion of Local Line Basic Monthly Service	\$ 21.99*	\$ 120.00*) (T) \$ 120.00* (T) *(T)
4.2	Custom Calling Features:	and the second s	
	Set Up Charge Call Waiting Call Forwarding Three-Way Calling Caller ID	\$ 5.00 \$ 5.00 \$ 5.00 \$10.00	\$10.00** (T)
4.3	Calling Feature Package – F	Retail Servio	ce Only
	Call Waiting, Call Forwardi	ng,	
	Three Way Calling, Caller ID	\$ 20.00	Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007
.4	Directory Services		Description fariff 11/07 IT
	Non-Published Service	\$ 5.00	(N)
pplied.	are represented here as if all . Lifeline customers who are tion Fee.	applicable . e not eligibl	Lifeline and Link-Up discounts have been le for the Link-Up discount pay a \$150.00 (N)
* (T)N eatures oplies.	ote: The custom calling feat are ordered at the time of in	tures set up itiation of S	charge activates one or all of the features. If Service, no custom calling features set up charge
sued:	December 11, 2006	<u></u>	Effective: December 12, 2006
sued B			Efferding y/Treasurer

Secretary/Treasurer 2228 S. 78th Street (T) Tacoma, Washington 98409-9050 (T)



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Vilaire Communications, I.c.

4.0 - RATES AND CHARGES (CONT'D)

4.5 Customized Toll Restriction Service

Docket No. 080065-TX Exhibit IT-2 (Page 91 of 128) Non-Confidential Portion of Audit Work Papers

Customized Toll Restriction Service is provided free of charge to Lifeline eligible Customers.

	All Options	Monthly Rate \$10.00	Non-recurring Charge \$18.00
4.6	Miscellaneous Charges		
	Change Telephone Number, Change Name, Service at ne		\$30.00 (I)
	Service Change Charge		\$10.00
	Caller Identification Blockin	g Activation	\$10.00
	Reconnection Fee		\$30.00
	Late Charge		\$10.00
	Returned Payment Charge		\$25.00
	Rush Order Charge		\$ 20.00
4.7	Directory Assistance		
	Per Call		\$2.00

Issued: January 29, 2007 Issued By:

Effective: January 30, 2007 Stan Efferding

Secretary/Treasurer 2228 S. 78th Street (T) Tacoma, Washington 98409-9050 (T)



4.7

17-1

	Phone Audit	$\begin{array}{c} \text{nunications, Inc.} \\ \text{Control No. 07} \\ Control No. 07$		4 ; 	Exh	ibit IT-2 (Pag -Confidential	e 97 of 12	8) I Audit Wor	k P
USAC Service Provid	ler Identification N	umber (1)	143020/0	<u>.</u>		Serving Area	a (2)	21990	8
(3)		<u></u>		(4)	<u> </u>				
Company Name:	VCI Company								
Mailing Address:	7304 Zircon Dr			a) Submi	ssion Date	J	uly 22, 2	2006	
	Lakewood, Wa	. 98498		_ <u> </u>					
.	Oton Jahasaa			b) Data M	onth		June	<u>}</u>	
Contact Name:	Stan Johnson	<u>^</u>	······				٦		
Telephone Number:	(253) 973 - 247			- c) Type of	filing (Check one	e): Original	Revis	sion	
Fax Number:	(253) 475 - 632						F land at	1	
E-mail Address:	stanj@vilaire.com	<u>n</u>		d) State R	eporting		Florid		
Lifeline			# Lifeline		Lifeline Suppo	d/	Total	Lifeline	_
Liieiiiie			Subscribers		Subscriber		Total	Support	
ier 1 Low-Income Sub	scribers		(a)		(b)*			<u>Support</u> (C)	
receiving federal		(5)	102	x S	6.50	=	\$	663	
ier 2 Low-Income Sub		\-/ <u>-</u>							
receiving federal		(6)	102	x \$	1.75	=	\$	179	
ier 3 Low-Income Sub		·-/				_	·		
receiving federal	-	(7)	102	x \$	1.75	=	\$	179	
ier 4 Low-Income Sub		· · ·		_ `					_
receiving federal		(8)	0	_ x \$	25.00	=	\$	0	
				Total	federal Lifeline		° s <u>∕] \$1</u> ,	,020.0000	
heck box to the right if OTE: (Do not include For multiple rates, use an av ink Up	partials or pro rata a		8 above) <u>Non-Tribal</u>	Total	federal Lifeline n of lines 5c, 6c, <u>Tribal</u>	support claim	7	tal Link Up	
OTE: (Do not include For multiple rates, use an av	partials or pro rata a erage amount		8 above)	Total	l federal Lifeline : n of lines 5c, 6c,	support claim	7		
OTE: (Do not include For multiple rates, use an av ink Up	partials or pro rata a erage amount ections waived	amounts on lines 5 -	8 above) <u>Non-Tribal</u> (a)	Total	l federal Lifeline n of lines 5c, 6c, <u>Tribal</u> (b)	support claim	<u>7</u> <u>To</u>	tal Link Up (c)	
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FCC 497 October 2000

LIFELINE AND LINK UP WORKSHEE

Docket No. 080065-TX Exhibit IT-2 (Page 93 of 128) Non-Confidential Portion of Audit Work Papers Avg. Burden Lat. P.

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(3)	<u> </u>			(4)						
Company Name:	VCI Company			_						
Mailing Address:	7304 Zircon Dr			a) Subm	ission Da	te	Aug	just 16	6, 2006	
	Lakewood, Wa	. 98498	·····							
				b) Data M	Nonth			July	/	_
	Stan Johnson									
	(253) 973 - 2470			c) Type o	f filing (C	heck one):	Original	Revi	sion	
Fax Number:	(253) 475 - 6328	3								_
E-mail Address:	stanj@vilaire.com]		d) State F	Reporting			Florid	da	
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Lifeline			# Lifeline			e Support/		Tota	I Lifeline	
			Subscribers		<u>Sul</u>	oscriber			Support	
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receiving federal l		(5)	165	_ ×	\$	3.50	. =	\$	1072.5	
Tier 2 Low-Income Subs	scribers									
receiving federal L	_ifeline Support	(6)	165	_ x	\$	1.75	. =	\$	289	
Tier 3 Low-Income Subs	scribers									
receiving federal L	_ifeline Support	(7)	165	_ x	\$	1.75	=	\$	289	
Tier 4 Low-Income Subs	scribers									
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Check box to the right if , NOTE: (Do not include p	artials or pro rata a			Tota	al federal		□ pport claim ;, 8c & 9)	\$\$ \$ <u>7</u> \$1	1,650.0000	_ `
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If you have any guestions, please call USAC at (866) 873(USF)-4727 Toll Free

LIFELINE AND LINK UP WORKSHEET Docket No. 080065-TX Exhibit IT-2 (Page 94 of 128) Non-Confidential Portion of Audit Work Papers

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(3)				(4)					
	VCI Company	0.14				•		•• ••••	
Mailing Address:	7304 Zircon Dr.			a) Submi	ission Date	Septe	ember	22, 2006	_
	Lakewood, Wa.	98498	······································		•		A	~*	
Contact Name:	Stan Johnson		······•	b) Data M	nonth	<i>.</i>	Augu	51	··
	(253) 973 - 2476				f filing (Check one		Revis	lian	
	(253) 475 - 6328				r ning (check one		Revis	51011	
-	stanj@vilaire.com			d) State F	Penorting		Florid	la	
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Lifeline			# Lifeline		Lifeline Support	rt/	Total	Lifeline	_
			Subscribers		Subscriber		i otal	Support	
Tier 1 Low-Income Subs	scribers		(a)		(b)*			(C)	
receiving federal L	_ifeline Support	(5)	215	x	\$ 6.50	=	\$	1397.5	
Tier 2 Low-Income Subs	scribers	-					-		
receiving federal L	ifeline Support	(6)	215	x	\$ 1.75	=	\$	376	
Tier 3 Low-Income Subs		· · · -			· · · · · · · · · · · · · · · · · · ·				_
receiving federal L		(7)	215	x	\$ 1.75	=	\$	376	
Tier 4 Low-Income Subs			· · · · · · · · · · · · · · · · · · ·		·		•		
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FCC 497 October 2000

Docket No. 080065-TX LIFELINE AND LINK UP WORKSHEE^{*}Exhibit IT-2 (Page 95 of 128) Non-Confidential Portion of Audit Work Papers

Avg. Duruch Law ,

(3)				(4)					
(3)	1/01 0			(4)					
Company Name:	VCI Company			_			~ · ·		
Mailing Address:	7304 Zircon D			a) Submi	ission Date		Octob	ber 20, 2006	
	Lakewood, W	a. 98498		_			•		
	Stan Jahnson			b) Data N	lonth		Se	eptember	
Contact Name:	Stan Johnson	· · · · · · · · · · · · · · · · · · ·		_					
Telephone Number:	(253) 973 - 247			c) Type o	f filing (Checl	(one): [Origin	nal	Revision	
Fax Number:	(253) 475 - 632							- 1	
E-mail Address:	stanj@vilaire.co	<u>m</u>		d) State R	leporting	<u> </u>	1	Florida	
Lifeline			# 1 :Cotto o					T.4.11.20.11	
Lifeline			# Lifeline		Lifeline Su			Total Lifeline	
Tier 1 Low-Income Sub	scribers		<u>Subscribers</u> (a)		<u>Subscri</u> (b)*	ber		<u>Support</u> (c)	
receiving federal		(5)	520	x	s 6.50) =		3380	
Tier 2 Low-Income Sub		(3) _	020	^	۵ <u></u>	<u>/</u> =	. 4		
			520		r 175	: _		010	
receiving federal I	• •	(6) _	520	×	\$1.75) =	: \$	§910	
Tier 3 Low-Income Sub			500					0.4.0	
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Tier 4 Low-Income Sub			•			•			
receiving federal I	Lifeline Support	(8) _	00	× 3	\$25.0	<u> </u>	\$	00	
			ed. Indicate dollar amo - 8 above)	unt, if applica	able, on line !	9. 🗖	\$	§	(;
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NOTE: (Do not include p For multiple rates, use an ave Link Up Number of Connec Charges waived po Total Connection o	partials or pro rata prage amount ctions waived er Connection charges waived	(11) (12) • (13)	- 8 above) <u>Non-Tribal</u> (a) 325 \$30.00 \$9,750.00	Tota (Sur	ll federal Life n of lines 5c, <u>Triba</u> (b) <u>0</u>	line support (6c, 7c, 8c & !	9)	<u>Total Link U</u> (c)	0_(1 2
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Docket No. 080065-TX Exhibit IT-2 (Page 96 of 128) Non-Confidential Portion of Audit Work Papers

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Tier 3 Low-Income Subscribe receiving federal Lifelin Tier 4 Low-Income Subscribe receiving federal Lifelin Check box to the right if parti NOTE: (Do not include partial	ers ne Support ers ne Support i als or pro ra	(7) _ (8) _	1,052	x	\$	1.75	- =	\$_	
receiving federal Lifelin Tier 4 Low-Income Subscribe receiving federal Lifelin Check box to the right if parti NOTE: (Do not include partial	ne Support ers ne Support i als or pro ra	(8)			·		- =	· -	1841
Tier 4 Low-Income Subscribe receiving federal Lifelin Check box to the right if parti NOTE: (Do not include partial	ers ne Support i als or pro r a	(8)			·		-	· -	
receiving federal Lifelin Check box to the right if parti NOTE: (Do not include partial	ne Support i als or pro r a		0	X	\$	05 00	_		
Check box to the right if parti NOTE: (Do not include partial	ials or pro ra					25.00	=	\$	0
		i amounts on lines 5	- 8 above)			eral Lifeline su lines 5c, 6c, 76		\$_	\$10,520.0000
For multiple rates, use an average a	amount		Non Tribal	(0	Sum of		5, 6C & 9)		Total Link Up
Link Up			<u>Non-Tribal</u> (a)			<u>Tribal</u> (b)			(c)
Number of Connections	s waived	(11)	233			<u>0</u>	_	-	233
Charges waived per Co	onnection	(12) •	\$30.00	(\$30 m	ax)	100	_(\$100 max))	
Total Connection charg	es waived	(13)	\$6,990.00		\$	-	-		
Deferred Interest		(14)	0				-		
Total Link Up dollars wa	aived	(15)	\$6,990.00		\$		=	\$_	\$6,990.0000
For multiple rates, use an average ar	mount								
Toll-Limitation Services (TLS)								
Incremental cost of prov		(16)	\$4.858132						
Number of subscribers f	for whom	(17)	1,052		Tot	al TLS dollars	claimed	\$_	\$5,110.7546
TLS initiated									
Presubscribed Interexcha			(For Price-cap	compani	es onl	; prior to 7/	1/2000)		
Monthly charge per line		(19)	0		-			~	<u> </u>
Number of Subscribers	per month	(20)	0		Iot	al PICC dollar	s waived	\$ =	0
ETC Payment (22)									
	_ifeline \$	\$10,520.0000	Total TL		\$5,1	10.7546	-		
Total L	_ink Up \$	\$6,990.0000	Total PIC	C \$		0	-		
			Total Dolla	rs \$	\$22,6	20.7546 /	H		
	<u></u>								

LIFELINE AND LINK UP WORKSHEE Docket No. 080065-TX Exhibit IT-2 (Page 97 of 128) Non-Confidential Portion of Audit Work Papers

		Number (1)	14302676	<u> </u>		36	erving Area	(2)_	21990	0
(3)				(4)						
· · · -	VCI Company			_			_			
-	7304 Zircon E		 ,	a) Subm	ission Date	ł	Dece	emb	er 22, 2006	
 _	Lakewood, W	/a. 98498								
	Stan Johnson			b) Data I	Month			NOV	ember	
-	(253) 973 - 24				f filing (Ch		Original		Revision	
· .	(253) 475 - 63			- c) type o	a ning (Ch	eck one).	Unginal	, i	revision	
<u> </u>	stanj@vilaire.co			d) State F	Reporting			FI	orida	
Lifeline			# Lifeline		Lifeline	Support/	<u> </u>		Total Lifeline	
		(C)	Subscribers			criber			<u>Support</u>	
Fier 1 Low-Income Subs			(a)		•	o)*			(c)	
receiving federal Li		(5)	1,875	x	\$6.	50	=	\$_	12187.5	
Tier 2 Low-Income Subse										
receiving federal Li		(6)	1,875	x	\$1.	75	- =	\$_	3281	
ier 3 Low-Income Subso		.	4 075			76				
receiving federal Li		(7)	1,875	×	\$ <u>1.</u>	75	=	\$_	3281	
ier 4 Low-Income Subsc			0			<u></u>				
receiving federal Li	meline Support	(8)	0	X	\$2	.00	- =	\$_	0	
heck box to the right if p	partials or pro ra	ata amounts are used	d. Indicate dollar amo	unt, if applic	able, on lir	e 9.		\$		
IOTE: (Do not include pa	artials or pro rata	amounts on lines 5 -	8 above)					_	<u> </u>	
				Tota	ai federal L	ifeline su	pport claim	\$	\$18,750.00	(
										<u> </u>
For multiple rates, use an avera	age amount				m of lines t	5c, 6c <u>,</u> 7c		=		`
	age amount	<u></u>	Non-Tribal		Tri	5c, 6c, 7c <u>bal</u>			Total Link Up	=`
Link Up		/11)	(a)		<u>Tri</u> (I	5c, 6c, 7c <u>bal</u> 5)			(c)	`
		(11)			<u>Tri</u> (I	5c, 6c, 7c <u>bal</u>		-		`
L ink Up Number of Connect	tions waived		(a) 1220	(Sur	<u>Tri</u> () (5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c)	`
Link Up	tions waived	(11) (12) •	(a)		<u>Tri</u> () (5c, 6c, 7c <u>bal</u> 5)			(c)	`
L ink Up Number of Connect Charges waived per	tions waived r Connection	(12) •	(a) 1220 \$30.00	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c)	`
L ink Up Number of Connect	tions waived r Connection		(a) 1220	(Sur	<u>Tri</u> () (5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c)	`
L ink Up Number of Connect Charges waived per	tions waived r Connection	(12) •	(a) 1220 \$30.00	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c)	`
L ink Up Number of Connect Charges waived per Total Connection ch	tions waived r Connection	(12) • (13)	(a) 1220 \$30.00 \$36,600.00	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c)	
L ink Up Number of Connect Charges waived per Total Connection ch	tions waived r Connection narges waived	(12) • (13)	(a) 1220 \$30.00 \$36,600.00	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c)	
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an average	tions waived r Connection narges waived s waived ge amount	(12) • (13) (14)	(a) 1220 \$30.00 \$36,600.00 0	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c) 1220	
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service	tions waived r Connection narges waived s waived ge amount es (TLS)	(12) • (13) (14) (15)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c <u>bal</u> 5) <u>)</u>	s, 8c & 9)		(c) 1220	
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of	tions waived r Connection harges waived s waived <u>ge amount</u> es (TLS) providing TLS	(12) • (13) (14) (15) (16)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$8.213061	(Sur	<u>Tri</u> (() () () () () () () () () () () () ()	5c, 6c, 7c bal o) <u>0</u> 00 	<u>, 8c & 9)</u> (\$100 max)	(c) 1220 \$36,600.00	
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of Number of subscribe	tions waived r Connection harges waived s waived <u>ge amount</u> es (TLS) providing TLS	(12) • (13) (14) (15)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00	(Sur	<u>Tri</u> (I ()	5c, 6c, 7c bal o) <u>0</u> 00 	<u>, 8c & 9)</u> (\$100 max)	(c) 1220	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated	tions waived r Connection harges waived s waived <i>ge amount</i> es (TLS) providing TLS ers for whom	(12) • (13) (14) (15) (16) (17)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$ 36,600.00 \$ 8 .213061 1,875	(Sur (\$30 max) 	Tri () _()	5c, 6c. 7c bal o) <u>0</u> 	claimed)	(c) 1220 \$36,600.00	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated resubscribed Interex	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom	(12) • (13) (14) (15) (16) (17) er Charge (PICC)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 (For Price-cap of the second sec	(Sur (\$30 max) 	Tri () _()	5c, 6c. 7c bal o) <u>0</u> 	claimed)	(c) 1220 \$36,600.00	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of Number of subscribe TLS initiated resubscribed Interex Monthly charge per I	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 (For Price-cap of 0) 0	(Sur (\$30 max) 	Total TLS	5c, 6c, 7c bal o) 2 	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated resubscribed Interex	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line	(12) • (13) (14) (15) (16) (17) er Charge (PICC)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 (For Price-cap of the second sec	(Sur (\$30 max) 	Tri () _()	5c, 6c, 7c bal o) 2 	claimed)	(c) 1220 \$36,600.00	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of I Number of subscribe TLS initiated Tesubscribed Interex Monthly charge per I Number of Subscribe	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 (For Price-cap of 0) 0	(Sur (\$30 max) 	Total TLS	5c, 6c, 7c bal o) 2 	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of I Number of subscribe TLS initiated resubscribed Interex Monthly charge per I Number of Subscribe	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line ers per month	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19) (20)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$8.213061 1,875 (For Price-cap of Content of Cont	(Sur 	Tri (() () () () () () () () () () () () ()	5c, 6c, 7c bal b) 2 2 20 - - 5 dollars or to 7/1 CC dollars	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated resubscribed Interex Monthly charge per I Number of Subscribe TC Payment (22)	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line ers per month tal Lifeline \$	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19) (20) \$18,750.0000	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 (For Price-cap of 0) 0 Total TLS	(Sur (\$30 max) companies 5 \$	Total TLS	5c, 6c, 7c bal b) 2 2 20 - - 5 dollars or to 7/1 CC dollars	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated resubscribed Interex Monthly charge per I Number of Subscribe TC Payment (22)	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line ers per month tal Lifeline \$	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19) (20)	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$8.213061 1,875 (For Price-cap of Content of Cont	(Sur (\$30 max) companies 5 \$	Total TLS only; pri Total PIC 15,399.4	5c, 6c, 7c bal b) 2 2 20 - - 5 dollars or to 7/1 CC dollars	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated resubscribed Interex Monthly charge per I Number of Subscribe TC Payment (22)	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line ers per month tal Lifeline \$	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19) (20) \$18,750.0000	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$36,600.00 (For Price-cap of 0) 0 Total TLS	(Sur 	Total TLS only; pri Total PIC 15,399.4	5c, 6c, 7c bal b) 2 20 	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1
Link Up Number of Connect Charges waived per Total Connection ch Deferred Interest Total Link Up dollars for multiple rates, use an avera- foll-Limitation Service Incremental cost of p Number of subscribe TLS initiated resubscribed Interex Monthly charge per I Number of Subscribe TC Payment (22)	tions waived r Connection harges waived s waived ge amount es (TLS) providing TLS ers for whom cchange Carrie line ers per month tal Lifeline \$	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19) (20) \$18,750.0000	(a) 1220 \$30.00 \$36,600.00 0 \$36,600.00 \$36,600.00 \$36,600.00 \$8.213061 1,875 (For Price-cap of 0 0 Total TLS Total PICO	(Sur 	Total TLS only; pri Total PIC 15,399.4 0	5c, 6c, 7c bal b) 2 20 	claimed	=) \$	(c) 1220 \$36,600.00 \$15,399.490	1

Docket No. 080065-TX Exhibit IT-2 (Page 98 of 128) Non-Confidential Portion of Audit Work Papers

(3)				(4)					
Company Name:	VCI Company			_					
Mailing Address:	7304 Zircon I			a) Subm	nission C	Date	Jan	uary	/ 15, 2007
	Lakewood, W	va. 90490		b) Data	Month		r	کمد	ember
Contact Name:	Stan Johnson	n			wonth			Jece	emper
Telephone Number:	(253) 973 - 24			c) Type o	of filing ((Check one)	Original	R	levision
Fax Number:	(253) 475 - 63	28			5	,			
E-mail Address:	stanj@vilaire.co	<u>om</u>	······	d) State I	Reportin	ng		Flo	orida
Lifeline	······································	· · · · · · · · · · · · · · · · · · ·	# Lifeline		Lifeli	ine Support	1	T	otal Lifeline
			Subscribers			ubscriber	-	·	Support
Tier 1 Low-Income Sub		(5)	(a) 4 602		•	(b)*		•	(c)
receiving federal ier 2 Low-Income Sub		(5) _	4,623	X	\$	6.50	_ =	\$	30049.5
receiving federal		(6)	4,623	J	¢	1.75	_	¢	8000
ier 3 Low-Income Sub		(0) -	4,023	X	\$	1.70	- =	»—	8090
receiving federal		(7)	4,623	x	\$	1.75	=	\$	8090
ier 4 Low-Income Sub		··/ _		_ ^			_	* <u> </u>	0000
receiving federal		(8)	0	x	\$	25.00	_ =	\$_	0
									£40.000.00
For multiple rates, use an ave	erage amount					es 5c, 6c, 7	upport claim c, 8c & 9)	\$	
For multiple rates, use an ave . ink Up	erage amount		<u>Non-Tribal</u> (a)			es 5c, 6c, 7 <u>Tribal</u>		\$	Total Link Up
and the second		(11)	<u>Non-Tribal</u> (a) 1198			es 5c, 6c, 7		\$	
.ink Up	ctions waived	(11) (12) •	(a)		m of line	es 5c, 6c, 7 <u>Tribal</u> (b)			<u>Total Link Up</u> (c)
<i>ink Up</i> Number of Conne	ctions waived er Connection		(a) 1198	(Su	m of line	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	c, 8c & 9)		<u>Total Link Up</u> (c)
.ink Up Number of Conne Charges waived p	ctions waived er Connection	(12) •	(a) 1198 \$30.00	(Su	m of line	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	c, 8c & 9)		<u>Total Link Up</u> (c)
<i>ink Up</i> Number of Conne Charges waived p Total Connection o	ctions waived er Connection charges waived	(12) • (13) (14)	(a) 1198 \$30.00 \$35,940.00 0	(Su	m of line	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	c, 8c & 9)		<u>Total Link Up</u> (c) 1198
<i>ink Up</i> Number of Conne Charges waived p Total Connection o Deferred Interest	ctions waived er Connection charges waived irs waived	(12) • (13)	(a) 1198 \$30.00 \$35,940.00	(Su	m of line	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	c, 8c & 9)		<u>Total Link Up</u> (c)
<i>ink Up</i> Number of Conne Charges waived p Total Connection o Deferred Interest Total Link Up dolla	ctions waived er Connection charges waived irs waived rage amount	(12) • (13) (14)	(a) 1198 \$30.00 \$35,940.00 0	(Su	m of line	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	c, 8c & 9)		<u>Total Link Up</u> (c) 1198
<i>ink Up</i> Number of Conne Charges waived p Total Connection o Deferred Interest Total Link Up dolla or multiple rates, use an aver	ctions waived er Connection charges waived rrs waived rage amount ces (TLS)	(12) • (13) (14)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00 \$5.152490	(Su	m of line	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	c, 8c & 9)		<u>Total Link Up</u> (c) 1198
<i>ink Up</i> Number of Conne Charges waived p Total Connection o Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscril	ctions waived er Connection charges waived rrs waived rage amount ces (TLS) f providing TLS	(12) • (13) (14) (15)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00	(Su	m of line 	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u>	<u>c, 8c & 9)</u> (\$100 max) 	\$	<u>Total Link Up</u> (c) 1198
<i>ink Up</i> Number of Conne Charges waived p Total Connection o Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscril TLS initiated	ctions waived er Connection charges waived rs waived rage amount ces (TLS) f providing TLS bers for whom	(12) • (13) (14) (15) (16) (17)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00 \$ 35,940.00 \$5.152490 4,623	(Su (\$30 max)	m of line 	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u> 100 - - TLS dollars	<pre>c, 8c & 9)(\$100 max) s claimed</pre>	\$	<u>Total Link Up</u> (c) 1198 \$35,940.00
.ink Up Number of Conne Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscril TLS initiated resubscribed Intere	ctions waived er Connection charges waived rage amount ces (TLS) f providing TLS bers for whom xchange Carrie	(12) • (13) (14) (15) (16) (17) er Charge (PICC)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00 \$35,940.00 \$5.152490 4,623 (For Price-cap of	(Su (\$30 max)	m of line 	es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u> 100 - - TLS dollars	<pre>c, 8c & 9)(\$100 max) s claimed</pre>	\$	<u>Total Link Up</u> (c) 1198 \$35,940.00
ink Up Number of Conne Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscril TLS initiated resubscribed Intere Monthly charge per	ctions waived er Connection charges waived rage amount ces (TLS) f providing TLS bers for whom xchange Carrie r line	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00 \$35,940.00 \$5.152490 4,623 (For Price-cap of 0	(Su (\$30 max)	m of line \$ Total \$ only ; [es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u> 100 - TLS dollars prior to 7/	c, 8c & 9) (\$100 max) - - - - - - - - - - - - -	\$	<u>Total Link Up</u> (c) 1198 \$35,940.00 \$23,819.962
.ink Up Number of Conne Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscril TLS initiated resubscribed Intere	ctions waived er Connection charges waived rage amount ces (TLS) f providing TLS bers for whom xchange Carrie r line	(12) • (13) (14) (15) (16) (17) er Charge (PICC)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00 \$35,940.00 \$5.152490 4,623 (For Price-cap of	(Su (\$30 max)	m of line \$ Total \$ only ; [es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u> 100 - - TLS dollars	c, 8c & 9) (\$100 max) - - - - - - - - - - - - -	\$	<u>Total Link Up</u> (c) 1198 \$35,940.00
ink Up Number of Conne Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscril TLS initiated resubscribed Intere Monthly charge per Number of Subscril	ctions waived er Connection charges waived rage amount ces (TLS) f providing TLS bers for whom xchange Carrie r line	(12) • (13) (14) (15) (16) (17) er Charge (PICC) (19)	(a) 1198 \$30.00 \$35,940.00 0 \$35,940.00 \$35,940.00 \$5.152490 4,623 (For Price-cap of 0	(Su (\$30 max)	m of line \$ Total \$ only ; [es 5c, 6c, 7 <u>Tribal</u> (b) <u>0</u> 100 - TLS dollars prior to 7/	c, 8c & 9) (\$100 max) - - - - - - - - - - - - -	\$	<u>Total Link Up</u> (c) 1198 \$35,940.00 \$23,819.962
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Approved by OMB

Docket No. 080065-TX Exhibit IT-2 (Page 99 of 128) Non-Confidential Portion of Audit Work Papers

(3)			(4)					
Company Name: VCI Compan	у							
Mailing Address: 7304 Zircon I			a) Subm	ission Date	Febr	ruar	y 15, 2007	
Lakewood, V	Va. 98498							
	······		b) Data I	Month		Jar	nuary	
Contact Name: Stan Johnso	n					_		
Telephone Number: (253) 973 - 24	476		c) Type c	of filing (Check on	e): Original	R	evision	
Fax Number: (253) 475 - 63	328							
E-mail Address: <u>stanj@vilaire.c</u>	om		d) State F	Reporting		Flo	orida	<u> </u>
Lifeline		# Lifeline		Lifeline Suppo		т	otal Lifeline	
Lnenne		# Liteline Subscribers		Subscriber	aru.	I	Support	
ier 1 Low-Income Subscribers		(a)		(b)*			(c)	
receiving federal Lifeline Support	(5)	5,913	x	\$ 6.50	=	\$	38434.5	
ier 2 Low-Income Subscribers	(-/ -		``			·		
receiving federal Lifeline Support	(6)	5,913	x	s 1.75	=	\$	10348	
ier 3 Low-Income Subscribers	(*)		_ "			*		—
receiving federal Lifeline Support	(7)	5,913	x	\$ 1.75	=	\$	10348	
ier 4 Low-Income Subscribers		-,				· _		
receiving federal Lifeline Support	(8)	0	x	\$ 25.00	=	\$	0	
heck box to the right if partials or pro r . OTE: (Do not include partials or pro rate			unt, if applic	able, on line 9.		\$_	······································	
	a amounts on lines o	o - 8 above)		al federal Lifeline		\$	\$59,130.00	(
For multiple rates, use an average amount	a amounts on lines o			m of lines 5c, 6c,		\$		(
		Non-Tribal		m of lines 5c, 6c, <u>Tribal</u>		\$	Total Link Up	(
For multiple rates, use an average amount .ink Up		<u>Non-Tribal</u> (a)		m of lines 5c, 6c,		\$	<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount	(11)	Non-Tribal		m of lines 5c, 6c, <u>Tribal</u> (b)		\$	Total Link Up	(
For multiple rates, use an average amount Link Up Number of Connections waived	(11)	<u>Non-Tribal</u> (a) 1289	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>	7c, 8c & 9)		<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount .ink Up		<u>Non-Tribal</u> (a)		m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>			<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount .ink Up Number of Connections waived Charges waived per Connection	(11) (12) •	<u>Non-Tribal</u> (a) 1289 \$30.00	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>	7c, 8c & 9)		<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount Link Up Number of Connections waived	(11)	<u>Non-Tribal</u> (a) 1289	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>)100	7c, 8c & 9)		<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount .ink Up Number of Connections waived Charges waived per Connection	(11) (12) •	<u>Non-Tribal</u> (a) 1289 \$30.00	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>)100	7c, 8c & 9)		<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount Link Up Number of Connections waived Charges waived per Connection Total Connection charges waived	(11) (12) • (13)	<u>Non-Tribal</u> (a) 1289 \$30.00 \$38,670.00	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>)100	7c, 8c & 9)		<u>Total Link Up</u> (c)	(
For multiple rates, use an average amount Link Up Number of Connections waived Charges waived per Connection Total Connection charges waived	(11) (12) • (13)	<u>Non-Tribal</u> (a) 1289 \$30.00 \$38,670.00	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>)100	7c, 8c & 9)		<u>Total Link Up</u> (c)	
For multiple rates, use an average amount Link Up Number of Connections waived Charges waived per Connection Total Connection charges waived Deferred Interest Total Link Up dollars waived or multiple rates, use an average amount	(11) (12) • (13) (14)	<u>Non-Tribal</u> (a) 1289 \$30.00 \$38,670.00 0	(Su	m of lines 5c, 6c, <u>Tribal</u> (b) <u>0</u>)100	7c, 8c & 9)		<u>Total Link Up</u> (c) 1289	(
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Approved by OMB

Docket No. 080065-TX Exhibit IT-2 (Page 100 of 128) Non-Confidential Portion of Audit Work Papers

(3)				(4)						
Company Name:	VCI Company									
Mailing Address:	7304 Zircon D	r SW			ission Date		Ma	rch	22, 2007	
Manny Address.	Lakewood, Wa				ission Date	:		arcn	22, 2007	
	Lakewood, We				Manth			Eat	oruary	
Contact Name:	Stan Johnson			b) Data I	wonth			Fer	Jiuary	_
Telephone Number:	(253) 973 - 247						Ontertury!	, ,	.	
Fax Number:	(253) 975 - 247			c) type o	of filing (Ch	eck one)	Original] +	Revision	
E-mail Address:	stanj@vilaire.com		·					EL	orida	
e-mail Address.	starij@viiaire.coj				Reporting			<u> </u>		
Lifeline			# Lifeline		Lifeline	Support	.,		Total Lifeline	
			# Liteline Subscribers			Support scriber	J.	I	Support	
Fier 1 Low-Income Sub	scribers		(a))*			<u>Support</u> (C)	
receiving federal		(5)	7,184	x	•	50	=	\$	46696	
ier 2 Low-Income Sub	• •	-					-	· -		
receiving federal		(6)	7,184	x	s 1	75	=	\$	12572	
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IOTE: (Do not include p	partials or pro rata a	amounts on lines 5	- 8 above)						.	
		amounts on lines 5	- 8 above)				upport claim	\$	\$71,840.00	(1
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For multiple rates, use an ave Link Up Number of Connec Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver OII-Limitation Servio Incremental cost o Number of subscrit TLS initiated resubscribed Intere Monthly charge per Number of Subscrit TC Payment (22)	erage amount ctions waived er Connection charges waived rage amount ces (TLS) f providing TLS bers for whom exchange Carrier r line bers per month	(11) (12) • (13) (14) (15) (16) (17) • • • • • • • • • • • • • • • • • • •	<u>Non-Tribal</u> (a) 1056 \$30.00 \$31,680.00 0 \$31,680.00 \$4.275847 7,184 (For Price-cap o 0 0	(Sur (\$30 max) companies 	m of lines (<u>Tri</u> (l <u>\$</u>) <u>1(</u> <u>\$</u> Total TLS only; pri Total PIC	5c, 6c, 7 <u>(bal</u> b) 0 - - S dollars or to 7/ CC dollar	c, 8c & 9) (\$100 max (\$100 max = = = s claimed	= 	Total Link Up (c) 1056 \$31,680.00 \$30,717.683	15
For multiple rates, use an ave Link Up Number of Connec Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscrit TLS initiated resubscribed Interee Monthly charge per Number of Subscrit TC Payment (22)	erage amount ctions waived er Connection charges waived ars waived rage amount ces (TLS) f providing TLS bers for whom exchange Carrien r line bers per month otal Lifeline \$	(11) (12) • (13) (14) (15) (16) (17) • Charge (PICC) (19) (20) • 71,840.0000	Non-Tribal (a) 1056 \$30.00 \$31,680.00 0 \$31,680.00 0 \$4.275847 7,184 (For Price-cap o 0 0 Total TL	(Sur 	m of lines (<u>Tri</u> (t <u>(</u>) <u>1</u> (<u>\$</u> Total TLS only; pri Total PIC 30,717.6	5c, 6c, 7 <u>(bal</u> b) 0 - - S dollars or to 7/ CC dollar	c, 8c & 9) (\$100 max (\$100 max = = = s claimed	= 	Total Link Up (c) 1056 \$31,680.00 \$30,717.683	15
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For multiple rates, use an ave Link Up Number of Connec Charges waived p Total Connection of Deferred Interest Total Link Up dolla or multiple rates, use an aver oll-Limitation Servio Incremental cost o Number of subscrit TLS initiated resubscribed Interee Monthly charge per Number of Subscrit TC Payment (22)	erage amount ctions waived er Connection charges waived ars waived rage amount ces (TLS) f providing TLS bers for whom exchange Carrien r line bers per month otal Lifeline \$	(11) (12) • (13) (14) (15) (16) (17) • Charge (PICC) (19) (20) • 71,840.0000	Non-Tribal (a) 1056 \$30.00 \$31,680.00 0 \$31,680.00 0 \$31,680.00 \$4.275847 7,184 (For Price-cap o 0 0 Total TL Total PICO	(Sur 	m of lines (<u>Tri</u> (l <u>\$</u>) <u>1(</u> \$ Total TLS only; priv Total PIC 30,717.6 0	5c, 6c, 7 <u>(bal</u> b) 0 - - S dollars or to 7 CC dollar 832	c, 8c & 9) (\$100 max (\$100 max = = = s claimed	= 	Total Link Up (c) 1056 \$31,680.00 \$30,717.683	15
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1.2

Docket No. 080065-TX Exhibit IT-2 (Page 101 of 128) Non-Confidential Portion of Audit Work Papers

USAC Service Provid									08
(3)				(4)					
Company Name:	VCI Compar								
Mailing Address:	7304 Zircon			a) Submis	ssion Date	A	pril	14, 2007	
	Lakewood,	Wa. 98498		_					
Contact Name:	Stan Johnso	n		b) Data M	onth	<u> </u>	M	arch	
Telephone Number:	(253) 973 - 2				filing (Check	one): Original	_ ٦	Revision	
Fax Number:	(253) 475 - 6				ming (Check (Original		revision	
E-mail Address:	stanj@vilaire.c			d) State R	eportina		Flo	orida	
<u> </u>									
Lifeline			# Lifeline		Lifeline Sup	port/	Т	otal Lifeline	
_			Subscribers		Subscribe	er		Support	
Tier 1 Low-Income Sub	-		(a)		(b)*			(c)	
receiving federal		(5)	6,895	_ × \$	6.50	=	\$	44817.5	
Tier 2 Low-Income Sub	-								
receiving federal	Lifeline Support	(6)	6,895	_ × \$	1.75	=	\$	12066	
Fier 3 Low-Income Sub	_								
receiving federal		(7)	6,895	_ x \$	1.75	=	\$_	12066	
Fier 4 Low-Income Sub									
receiving federal l	Lifeline Support	(8)	00	_ × \$	25.00	=	\$_	0	
					hla on line O		\$		
Check box to the right if IOTE: (Do not include p								\$CD 050 00	· `
	partials or pro rat			Total	federal Lifelin	ne support clain		\$68,950.00	· '
IOTE: (Do not include p	partials or pro rat			Total		ne support clain			· `
IOTE: (Do not include p For multiple rates, use an ave Link Up	partials or pro rat	amounts on lines :	5 - 8 above) <u>Non-Tribal</u> (a)	Total	federal Lifelir of lines 5c, 6	ne support clain		\$68,950.00 Total Link Up (c)	· `
IOTE: (Do not include p	partials or pro rat		5 - 8 above) <u>Non-Tribal</u>	Total	federal Lifelin of lines 5c, 6 <u>Tribal</u>	ne support clain		Total Link Up	· '
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IOTE: (Do not include p For multiple rates, use an ave Link Up Number of Conne Charges waived p Total Connection of Deferred Interest	partials or pro rat erage amount ctions waived er Connection charges waived rs waived age amount	(11) (12) • (13) (14)	5 - 8 above) <u>Non-Tribal</u> (a) 1085 \$30.00 \$32,550.00 0	Total (Sum	federal Lifelir of lines 5c, 6 <u>Tribal</u> (b) <u>0</u> 100 \$	ne support clain ic, 7c, 8c & 9)	n \$	<u>Total Link Up</u> (c) 1085	(1 (1
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Mailing Address:	7304 Zircon Dr. S	W		a) Sub	mission [Date	٨	May	16, 2007	
	Lakewood, Wa.	98498]						
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Contact Name: Felephone Number:	Stan Johnson (253) 973 - 2476		·····	-				7	_	
Fax Number:	(253) 475 - 6328			- C) Type	of filing i	(Check one)	Original		Revision	
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(3) (4) Company Name: VCI Company T304 Zircon Dr. SW Lakewood, Wa. 59498 a) Submission Date June 14, 2007 Mailing Address: Stan Johnson Telephone Number: Stan Johnson (253) 973 - 2476 a) Submission Date June 14, 2007 Email Address: Stan Johnson Telephone Number: Stan Solar e) Data Month May Email Address: Stan Johnson (E0) Total Lifeline Support: Total Lifeline Support: Ter 1 Low-Income Subscribers Subscribers Subscribers State Reporting Fordal Ter 2 cov-Income Subscribers (D) 6,895 x S 1.75 S 12066 Ter 4 Low-Income Subscribers (D) 6,895 x 1.75 S 12060 Ter 4 Low-Income Subscribers (D) 6,895 x 1.75 S 12060 Ter 4 Low-Income Subscri					- 1 1 1/ IT	Docket No. 980965-TX Exhibit IT-2 (Page 103 of 128 Non-Confidential Portion of /			
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Company Name:	VCI Company 7304 Zircon D			-		.		1	40,0007	
Mailing Address:	Lakewood, Wa			a) Submission Date		July 12, 2007				
Contact Name:	Stan Johnson	<u> </u>		b) Data Month		June				
Telephone Number: Fax Number:		76		c) Type of filing (Check one):			Original	Original Revision		
E-mail Address: <u>stanj@vilaire.com</u>				d) State Reporting		Florida		lorida		
Lifeline			# Lifeline		Life	eline Support	V		Total Lifeline	
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Docket No. 080065-TX Exhibit IT-2 (Page 105 of 128) Non-Confidential Portion of Audit Work Papers

Vilarie Communications, INC. (VCI) TERMINATION Twelve Month Period Ended June 30, 2007 Summary Of Work Performed

OBJECTIVE:

To verify that the company allows subscribers 60 days following the date of impending termination letter.

WORK PERFORMED:

- Obtained a document from the company stating that VCI send a separate letter from the Bill informing the customer of the termination, and give the customer 60 days to appeal.
 - 2) On asking VCI for sample of termination letters, and next three bills subsequent to the termination letters of each customer terminated, the
- company responded that there are no customers that are terminated because of ineligibility, as the company had not been in Florida for the entire year. VCI's first verification of continued eligibility for Florida customers will be conducted in January of 2008.

CONCLUSION:

Workpaper are included. No further work performed.

SOURCE AS Indisated

Lead 21

VCI POLICY REGARDING NOTIFICATION OF CUSTOMER INELIGIBILITY

FCC and some state rules require that customers who are deemed ineligible for Lifeline or Link-Up service have a minimum of 60 days to appeal the agency determination of ineligibility. When VCI discovers that a customer is ineligible for Lifeline and/or Link-Up service, the customer must be mailed a letter informing the customer that the customer has been deemed ineligible, their Lifeline and/or Link-Up service will be continued for sixty days to permit the customer to appeal the agency determination of ineligibility and that if the customer cannot provide proof of eligibility by the end of the sixty-day period, the customer can either switch to another carrier or be billed for local exchange service by VCI at the non-Lifeline rate.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCL YES Ponsycon Legomanne Jon

termination process

1.196 1.1



Request No. 21

- a. Please provide a list of customers that were terminated in accordance with 54.410(d).
- b. Please provide a copy of the termination letters that were sent to the above stated customers.
- c. Please provide the next three bills subsequent to the termination letters of each customer terminated.
- Response: There is no section (d) of 47 C.F.R. 54.410. If you are requesting a list of customers terminated pursuant to 47 C.F.R. 54.410(c), Verification of continued eligibility, VCI did not conduct a verification in 2007 because it had not yet been in Florida for an entire year in January 2007. VCI's first verification of continued eligibility for Florida customers will be conducted in January of 2008. No Florida customers have been terminated for ineligibility.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description $V \subset \int V \subseteq S for S r$ Construction for the formula of the formula of

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Docket No. 080065-TX Exhibit IT-2 (Page 108 of 128) Non-Confidential Portion of Audit Work Papers

Vilarie Communications, INC. (VCI) LINE COUNT Twelve Month Period Ended June 30, 2007 Summary Of Work Performed



OBJECTIVE:

To verify the amounts that were submitted for each period on forms FCC 497. To confirm that duplicate telephone numbers were not included in the subscriber listings, nor that the carrier misclassified single-line businesses, multi-line business and residential.

WORK PERFORMED:

- 22 -// 1) Obtained lists of customers names, Phone numbers, addresses, for Each of LifeLine and LinkUp Programs.
- $2^{2-\sqrt{2}}$ Compare the number of Customers on the lists to the number of customers reported on FCC497 forms.
 - 3) Check for duplicate phone numbers on each of LifeLine and LinkUp List.
- 18-12 4) Reconcile the amounts reported on forms FCC497 to the tariff.
 - 5) Verify the classification of customers.

10

CONCLUSION:

Through verifying the phone numbers on the subscriber listing, the auditor staff found that there are duplications in the subscriber listings of LinkUp program (See Finding No. 3). There is a total of 1,092 duplicate phone numbers in the LinkUp Program listing.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description Control Automatication (Control Automatication)

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Docket No. 080065-TX Exhibit IT-2 (Page 109 of 128) Non-Confidential Portion of Audit Work Papers

FILED/ACCEPTED

DEC - 4 2006

Federal Communications Commission Office of the Secretary

VCI Company P.O. Box 98907 Lakewood, WA 98496-8907 Telephone: (253) 830-0056 Facsimile: (253) 475-6328

Via Overnight Delivery

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743

Re:

VCI Company – Section 63.71 Application of Authority to Discontinue Local Exchange Services in Oregon and Washington

Dear Ms. Dortch:

Enclosed are an original and five (5) copies of VCI Company's Section 63.71 Application for Authority to Discontinue Local Exchange Services in Oregon and Washington, filed pursuant to Section 214(a) of the Telecommunications Act of 1934, as amended and Section 63.71 of the Commission's rules. A copy of this application has been sent to Carmell Weathers via electronic mail at <u>carmell.weathers@fcc.gov</u>. With this application, VCI requests authority to discontinue services in Washington on January 1, 2007 and in Oregon on February 1, 2007.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this transmittal letter in the self-addressed, postage paid envelope provided for this purpose.

Questions regarding this filing may be directed to me at the telephone and facsimile numbers above or via electronic mail at <u>staceyk@vcicompany.com</u>.

Sincerely,

VCI Company

Stacev Klinzman

Regulatory Attorney

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VC = VC is the set of the complement of the set of the s

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Docket No. 080065-TX Exhibit IT-2 (Page 110 of 128) Non-Confidential Portion of Audit Work Papers

FILED/ACCEPTED

DEC - 4 2006

Federal Communications Commission Office of the Secretary

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FEDERAL COMMUNICATIONS COMMISSION Washington, D.C.

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Before the

Washington, D.C. f) Application of)

In the Matter of Section 63.71 Application of VCI Company For Authority to Discontinue Local Exchange Services in Oregon and Washington

SECTION 63.71 APPLICATION

VCI Company ("VCI"), through its undersigned counsel, hereby files this Application to discontinue providing local exchange services in the States of Oregon and Washington, pursuant to Section 63.71 of the Commission's rules, 47 C.F.R. § 63.71, and Section 214(a) of the Communications Act of 1934, as amended. Specifically, VCI is seeking to discontinue the provision of flat rate, basic local exchange service and ancillary services, such as custom calling features, to non-federal governmental customers in Qwest Communications, Inc.'s ("Qwest") service areas in Oregon and Washington. Service will be discontinued upon approval of this Application by the Federal Communication Commission ("Commission") and approval of service discontinuance notices filed by VCI with the Public Utility Commission of Oregon ("PUCO") and the Washington Utilities and Transportation Commission ("WUTC").

Because VCI is a designated Eligible Telecommunications Carrier in both Oregon and Washington, VCI has filed or is in the process of filing with these entities notices of relinquishment of ETC status pursuant to 47 C.F.R. § 54.205.

In support of this Application, VCI submits the following information:

I. Description of Discontinuance

1. Name and address of carrier.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description 1997 June 30th, 2007 USCONTINUES Server 1997 Lt

VCI Company 2228 S. 78th Street Tacoma, Washington 98409-9050

Correspondence and communications concerning this Application should be directed to:

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WC Docket No.

Docket No. 080065-TX Exhibit IT-2 (Page 111 of 128) Non-Confidential Portion of Audit Work Papers

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

Stacey A. KlinzmanFrom June 1st, 2006Regulatory AttorneyDescriptionVCI Company2228 S. 78th StreetTacoma, Washington 98409-9050Telephone: 253.830.0056Facsimile:253.475.6328Electronic mail:staceyk@ycicompany.com

And to:

Stan Efferding Secretary/Treasurer VCI Company 2228 S. 78th Street Tacoma, Washington 98409-9050 Telephone: 253.830.0051 Facsimile: 253.475-6328 Electronic mail: <u>vilaire@comcast.net</u>

2. Date of planned service discontinuance.

The anticipated date for the discontinuance of local exchange services is upon approval of this application by the Commission, and further approval by the Public Utility Commission of Oregon and Washington Utilities and Transportation Commission. Under state commission rules, VCI expects that the WUTC will approve service discontinuance on January 1, 2007 and that the OPUC will approve service discontinuance on February 1, 2007.

3. Points of geographic areas of service affected.

By this Application, VCI seeks authority to discontinue the provision of local exchange services, specifically basic local service and ancillary services, such as custom calling features, throughout its Oregon and Washington service areas.

4. Brief description of the type of service affected.

VCI provides flat rated, basic local exchange service permitting customers unlimited calling within the local calling area, and ancillary services in Qwest's Oregon and Washington service areas. Upon approval of this Application by the Commission and approval of VCI's requests to cease providing service filed with the PUCO and WUTC, VCI intends to discontinue providing all services in the States of Oregon and Washington. VCI will not be abruptly discontinuing service to its customers. Existing customers will continue to be served by VCI

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Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

until they switch to another carrier or are disconnected for nonpayment of bills.

5. Brief description of the dates and methods of notice to all affected customers.

Written notice to all affected customers substantially in the form of the sample letters attached as Exhibit A was mailed to customers on November 29, 2006. As of the date of filing of this Application, VCI provides local exchange telecommunications service to 1,629 Oregon customers and 17, 258 Washington customers.

6. Non-dominance of the carrier with respect to the service to be discontinued.

VCI is non-dominant with respect to the services that it proposes to discontinue.

7. Service.

In accordance with 47 C.F.R. § 63.71(a), VCI has mailed copies of this Application to the PUCO and the WUTC. Copies of this Application also have been sent to Governor Kulongoski of Oregon, Governor Gregoire of Washington, and to the Secretary of Defense.

II. <u>Circumstances of Discontinuance</u>

As part of VCI's plan to ensure the continued long-term profitability of the Company, VCI has determined to discontinue providing basic local exchange service and ancillary services in Oregon and Washington. As a result of recent Commission decisions deregulating the prices of network element combinations, and Incumbent Local Exchange Carrier cost increases, service in these states has become cost prohibitive for the company. Service only can be maintained by increasing rates and charges to the consumer or to the detriment of overall company operations and the quality of service to other customers. VCI's desire to maintain its position in a competitive market requires it to discontinue serving customers in these states.

Quest is the incumbent local exchange carrier in VCI's Oregon and Washington service areas. Many competitive carriers have been certified to provide service in Quest's service areas. In addition to Quest, competitive wireline and wireless carriers have been designated as ETCs in Quest's Oregon and Washington service areas. Thus, alternative service providers are readily

SOURCE

available to serve VCI's customers. Finally, VCI does not provide a unique service that would be difficult for consumers to find elsewhere. Residential, flat rated, basic local exchange service, permitting unlimited calling within the customer's local service area is a common service readily available to VCI's current customers through Qwest and authorized competitive carriers in Qwest's service areas in Oregon and Washington.

III. <u>Conclusion</u>

VCI believes that the proposed discontinuance of service in Oregon and Washington is reasonable and necessary. As VCI will not be abruptly disconnecting service to customers and alternate carriers are available to serve consumers residing in VCI's service area, the discontinuance of service should not be unduly disruptive to the present or future public convenience and necessity. For the foregoing reasons, VCI respectfully requests, pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a), and Section 63.71 of the Commission's Rules, 47 C.F.R. § 63.71, that the Commission permit it to discontinue the provision of local exchange services to customers residing in Oregon and Washington.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description $VCI \propto cs$ Parseote A Respectfully submitted,

VCI Company

Stácey A /Klinzman Regulatory Attorney VCI Company 2228 S. 78th Street Tacoma, Washington 98409-9050

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Anti-Drug Abuse Act Certification

Answer YES if all parties to the application are in compliance with Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. Section 862, the federal law which provides federal and state court judges the discretion to deny federal benefits to individuals convicted of offenses consisting of the distribution of controlled substances. For a definition of "party" for these purposes, see <u>47 C.F.R. Section 1.2002(b)</u>. See also Amendment of Part 1 of the Commission's Rules to Implement Section 5301 of the Anti-Drug Abuse Act of 1988, 6 FCC Rcd 7551, 57 Fed. Reg. 00186 (1991).

X_____YES NO_____

By checking yes, the applicant certifies that, in the case of an individual applicant, he or she is not subject to a denial of federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 862, or, in the case of a non-individual applicant (e.g., corporation, partnership or other unincorporated association), no party to the application is subject to a denial of federal benefits that includes FCC benefits pursuant to that section. For the definition of a party for these purposes, see 47 C.F.R. Section 1.2002(b).

I certify that the statements made in this application are true, complete, and correct to the best of my knowledge and belief, and are made in good faith.

VCI Company Name of Applicant 11/29 Signature and Date Stan Efferding Printed Name of Person Signing Secretary/Treasurer Title

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description $V \subset \int V \subseteq V$ and $V \subseteq V$ is control of the second s

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Docket No. 080065-TX Exhibit IT-2 (Page 115 of 128) Non-Confidential Portion of Audit Work Papers

EXHIBIT A

NOTICES TO AFFECTED CUSTOMERS (Attached)

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCI YES Ponse En discontinuities of Service North Service

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Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

VCI COMPANY, P.O. Box 98907 Lakewood, Washington 98496-8907 Telephone: 800-923-8375

November 29, 2006

Customer Name Address State, Zip Docket No. 080065-TX Exhibit IT-2 (Page 116 of 128) Non-Confidential Portion of Audit Work Papers

RE: Notice of Intention to Discontinue Providing Local Exchange Services in Oregon

Dear Customer:

VCI Company ("VCI") has filed an application with the Federal Communications Commission ("FCC") to discontinue providing local exchange service in Oregon. Service discontinuance will not begin until approval of VCI's application before the FCC, and until the Public Utility Commission of Oregon ("PUCO") has approved VCI's request to discontinue service. Subject to approval by the FCC and the PUCO, the anticipated date when VCI will no longer provide local exchange service is February 1, 2007.

Prior to the date of service discontinuance, VCI will continue to be your basic local service provider unless you switch to another local exchange carrier or are disconnected for non-payment for service. Several other carriers, including Qwest Communications, Inc., are authorized to serve customers in your area and are able to serve Lifeline and Link-Up eligible consumers at reduced rates. Your action is required! You must contract with a new service provider as quickly as possible or you may lose your services. Please select a new carrier as soon as possible to avoid any interruption of service.

The FCC normally will authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20054, and include in your comments a reference to the Sec. 63.71 Application of VCI Company. Comments should include specific information about the impact of this proposed discontinuance upon you, including any inability to acquire reasonable substitute service.

VCI appreciates the opportunity it has had to serve you. If you have any questions regarding VCI's service discontinuance, please contact Customer Service at 800-923-8375.

VCI Company

SOURCE

VCI COMPANY, P.O. Box 98907 Lakewood, Washington 98496-8907 Telephone: 800-923-8375

November 29, 2006

Customer Name Address State, Zip

RE: Notice of Intention to Discontinue Providing Local Exchange Services in Washington

Dear Customer:

VCI Company ("VCI") has filed an application with the Federal Communications Commission ("FCC") to discontinue providing local exchange service in Washington. Service discontinuance will not begin until approval of VCI's application before the FCC, and until the Washington Utilities and Transportation Commission ("WUTC") has approved VCI's request to discontinue service. Subject to approval by the FCC and the WUTC, the anticipated date when VCI will no longer provide local exchange service is January 1, 2007.

Prior to the date of service discontinuance, VCI will continue to be your basic local service provider unless you switch to another local exchange carrier or are disconnected for non-payment for service. Several other carriers, including Qwest Communications, Inc., are authorized to serve customers in your area and are able to serve Lifeline and Link-Up eligible consumers at reduced rates. Your action is required! You must contract with a new service provider as quickly as possible or you may lose your services. Please select a new carrier as soon as possible to avoid any interruption of service.

The FCC normally will authorize this proposed discontinuance of service unless it is shown that customers would be unable to receive service or a reasonable substitute from another carrier or that the public convenience and necessity is otherwise adversely affected. If you wish to object, you should file your comments as soon as possible, but no later than 15 days after the FCC releases public notice of the proposed discontinuance. Address them to the Federal Communications Commission, Wireline Competition Bureau, Competition Policy Division, Washington, DC 20054, and include in your comments a reference to the Sec. 63.71 Application of VCI Company. Comments should include specific information about the impact of this proposed discontinuance upon you, including any inability to acquire reasonable substitute service.

VCI appreciates the opportunity it has had to serve you. If you have any questions regarding VCI's service discontinuance, please contact Customer Service at 800-923-8375.

VCI Company

SOURCE

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21-8

I hereby certify that the foregoing Section 63.71 Application of VCI Company was served this 29th day of November, 2006, by providing true and correct copies thereof to the following persons at the addresses appearing below:

Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 9300 East Hampton Drive Capitol Heights, MD 20743 (via Overnight Delivery)

Vikie Bailey-Goggins Public Utility Commission of Oregon 550 Capital St. NE #215 Salem, OR 97301-2551 (via electronic mail and U.S. mail, 1st class, postage prepaid)

Ms. Carole Washburn Executive Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive S.W. Olympia, Washington 98504-7250 (via electronic mail: records@wutc.wa.gov)

The Honorable Theodore R. Kulongoski Governor of the State of Oregon 254 State Capitol Salem, Oregon 97310 (via U.S. mail, 1[#] class, postage prepaid)

The Honorable Christine Gregoire Office of the Governor P.O. Box 40002 Olympia, WA 98504-0002 (via U.S. mail, 1[#] class, postage prepaid)

Secretary of Defense Special Assistant for Telecommunications Pentagon, Washington, D.C. 20301 (via U.S. mail, 1st class, postage prepaid)

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Docket No. 080065-TX Exhibit IT-2 (Page 119 of 128) Non-Confidential Portion of Audit Work Papers

Vilarie Communications, INC. (VCI) TOLL LIMITATION SERVICE Twelve Month Period Ended June 30, 2007 Summary Of Work Performed

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OBJECTIVE:

To verify the TLS amounts reported on forms FCC 497 are reasonable. The Toll Limitation Service is required by the Cusomer, and the incremental costs reported on forms FCC 497 do not include joint and common costs..

WORK PERFORMED:

26	1)	Requested the company to provide the details of the incremental costs for the months June 2006, July 2006, and May 2007.
26-1	2)	Compare the details of the incremental costs of the three months to the
		Rates and charges of the Carrier Bell South.
25-7	3)	Verify with the company that the toll limited service is selected by the
		Customer, and not required by the Carrier.

CONCLUSION:

The company provided confidential documents (See WP. 26) about a certain discount percentage that BELL SOUTH offers them for recurring and non-recurring costs. Also the company provided Bell South Tariff of recurring and non-recurring costs.

Work paper are included in both files. No further work preformed.

Vilaire Communications. Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description

Lead 25 & 26

SOURCE As Indicated

Docket No. 080065-TX Exhibit IT-2 (Page 120 of 128) Non-Confidential Portion of Audit Work Papers

Vilarie Communications, INC. (VCI) TOLL LIMITATION SERVICE Twelve Month Period Ended June 30, 2007 Summary Of Work Performed

07

OBJECTIVE:

To verify the TLS amounts reported on forms FCC 497 are reasonable. The Toll Limitation Service is required by the Customer, and the incremental costs reported on forms FCC 497 do not include joint and common costs..

WORK PERFORMED:

26	1)	Requested the company to provide the details of the
		incremental costs reported on Forms FCC-497 for each of the months
		June 2006, July 2006, and May 2007.
26-1	2)	Compare the details of the incremental costs of the three months to the
		Rates and charges of the Carrier Bell South.
2.5.1	3)	Verify with the company that the toll limited service is selected by the
		Customer, and is not required by the Carrier.

CONCLUSION:

The company provided confidential documents (See WP. 26) about a certain discount percentage that VCI got from its sole underlying Carrier for recurring and non-recurring costs. Also the company provided its sole underlying Carrier Tariff for recurring and non-recurring costs.

Work paper are included in both files. No further work preformed.

Vilaire Communications, Inc. Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description $\frac{1}{10}$ Use $\frac{1}{100}$ and $\frac{1}{100}$ Control and $\frac{1}{100}$ and $\frac{1}{100}$ 1.1

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Docket No. 080065-TX Exhibit IT-2 (Page 121 of 128) Non-Confidential Portion of Audit Work Papers

VCI Company PO Box 98907 Lakewood, WA 98498 Phone: (800) 923-8375 Fax: (253) 475-6328



<u>Via Electronic Mail</u>

June 15, 2007

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description fall Limitation Service what f

John Mann Regulatory Analyst Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, FL 32399-0850

Re: Vilaire Communications, Inc. – Responses to Florida Public Service Commission ("Commission") Letter of May 4, 2007

Mr. Mann:

Below, in question and answer format, please find Vilaire Communications, Inc.'s ("VCI" or "Company") responses to the data requested in the Commission's May 4, 2007 letter. Please be reminded that VCI was unable to respond to the Commission's letter by the date indicated therein because the Company never received the letter. Future Commission inquiries should be mailed to the Company at 2228 S. 78th Street, Tacoma, WA 98409-9050 and transmitted to me via electronic mail at <u>vilaire@comcast.net</u>.

As an initial matter, VCI believes it is important to address the reasoning behind the FCC's rule mandating that customers be provided the <u>option</u> of blocking toll calls. The FCC recognized that the low income customer was falling victim to high long distance charges on their bills because they were unable to obtain or unaware of the existence of toll blocking. There is a long standing history of cases concerning low income customers falling victim to disconnection of service due to non-payment of high long distance bills and/or charges for ancillary services. The rule was put in place to help protect low income consumers from long distance charges accumulating on their bills and to help more customers obtain this important protection.

Recognizing the FCC's intent and reasoning, VCI actively educates its customers about methods for managing the cost of their telephone service. By significantly reducing or even eliminating toll charges, the low-income consumer's telephone bill is more financially manageable and more likely to be paid. Consumers who pay their telephone bills remain on the network. Toll blocking is one option VCI offers its customers to lower or eliminate long distance bills. VCI does not require its Lifeline customers to subscribe to toll blocking service.

SOURCE

VCI provides access to long distance service for those customers who request this service by placing a 'PIC' on the line which directs the customer's 1+ call through the interexchange carrier of their choice.

Data Requests and Responses

1. How many Lifeline customers does VCI have in Florida?

Response: As of May 31, 2007, VCI had 6,895 Lifeline customers in Florida.

- 2. Of these VCI Lifeline customers, how many were made aware of the options regarding access to interexchange service when either initiating or maintaining service from VCI?
 - <u>Response</u>: All Lifeline customers are made aware that they may obtain long distance service through the long distance carrier of their choice. Potential customers who contact VCI to inquire about service listen to the following automated message:

"Access to interexchange services are available upon request. Also, eligible customers may request toll blocking for free to prevent someone from running up your bill."

VCI's customer service representatives also read potential customers the following script prior to their initiation of service:

"VCI does not sell long distance service so you can either contact a long distance company to purchase your own long distance or you can choose to have a free toll block placed on your line so you never have to worry about someone running up your bill."

Once they subscribe to service, VCI customers are continually reminded that they may obtain long distance service through a notification included on the monthly bill.

SOURCE

25-1

3. What number of VCI Lifeline customers in Florida have chosen to have their toll blocking removed?

Response: 7

4. According to 47 C.F.R. 54.101(a), a company must offer "access to interexchange service." If VCI is automatically applying toll-blocking to Lifeline clients, please explain how this conforms to the standard of allowing access to interexchange service.

<u>Response</u>: VCI does not automatically apply toll blocking to Lifeline clients.

In addition, please explain the following conditions drawn from your customer agreement:

TOLL BLOCKING:

A Toll block has been placed on your line in lieu of a deposit to prevent unwanted charges from appearing on your bill such as collect calls, operator assistance and long distance VCI Company Inc will lift toll blocking, at no charge, if you establish a direct relationship with an interexchange carrier. The interexchange carrier may require a service deposit, depending upon your credit history.

With a \$75 deposit, VCI Company Inc will lift toll blocking and not charge you the \$20 change order fee to perform this service, even if you do not identify a presubscribed interexchange carrier. Under this option you will not be able to place 1+ dialed toll calls

With a \$75 deposit, VCI Company Inc will lift toll blocking to operator services and not charge you the \$20 change order fee to perform this service

Response: The language serves as a reminder to Lifeline clients who have elected toll blocking of the circumstances under which toll blocking may be removed. VCI was required by the Universal Service Administrative Company ("USAC") to make this notification to customers in 2005. The toll blocking language above is included on information supplied to all customers VCI serves in every state. VCI has not collected a deposit from any Florida consumer. Those Florida customers that desire access to interexchange services always select a carrier for use of long distance services.

The Commission should take notice that the Toll Blocking language indicates that deposits are not required from any customer that creates a relationship directly with an interexchange carrier. The Commission also should take notice that VCI does not sell long distance service or contract with any interexchange carriers. The Company does not receive income from Lifeline customers accessing interexchange services, either directly or indirectly.

SOURCE

25-2

John Mann, Regulatory Analyst June 15, 2007 Page 4 of 6

Docket No. 080065-TX Exhibit IT-2 (Page 124 of 128) Non-Confidential Portion of Audit Work Papers

Response to No. 4, Cont'd:

Historically, VCI found that when a customer requested the removal of toll blocking service, those customers that did not establish a relationship with a long distance carrier often made long distance calls, either through dial-around calling or 3rd party operator services connections. The charges for these calls then would be billed to VCI by the ILEC. The ILEC long distance billings that VCI attempted to pass through to its customers increased the cost of telephone service beyond what the customer was willing to pay. Those customers then would be disconnected for non-payment.

VCI estimated the \$75.00 deposit based on these ILEC long distance billings to VCI. The deposit amount listed above was considered fair by the USAC when considering the average anticipated monthly billings for long distance charges.

- 5. The following is contained in the deposit rule for Florida carriers:
 - 25-4.109 Customer Deposits.

(2) Amount of deposit. The amount of the initial required deposit shall not exceed an amount equal to the charges for one month's local exchange service plus two months estimated toll service provided by or billed by the LEC. If, after ninety (90) days service, the actual deposit is found to be greater than an amount equal to one month's local service plus two months actual average toll service provided by or billed by the LEC, the company shall, upon demand of the subscriber to the Company, promptly refund the difference.

Please explain how your deposit practices comply with this regulation.

Response: As indicated above, VCI was required by the USAC to notify customer of the conditions under which it would lift toll blocking for those customers who elected toll blocking on their accounts. The Toll Blocking language is included on information supplied to all customers VCI serves in all states where the Company provides service. VCI has not collected a deposit from any Florida customer.



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John Mann, Regulatory Analyst June 15, 2007 Page 5 of 6

Docket No. 080065-TX Exhibit IT-2 (Page 125 of 128) Non-Confidential Portion of Audit Work Papers

6. According to Florida Statute 364.10(b): Undue advantage to person or locality prohibited; Lifeline service.-- An eligible telecommunications carrier shall offer a consumer who applies for or receives Lifeline service <u>the option</u> of blocking all toll calls or, if technically capable, placing a limit on the number of toll calls a consumer can make. The eligible telecommunications carrier may not charge the consumer an administrative charge or other additional fee for blocking the service.

Please explain how VCI is providing its Lifeline customers in Florida the option of blocking toll calls, versus being automatically enrolled in toll-blocking.

Response: VCI does not automatically enroll its Lifeline customers in toll blocking. Also See Response to No. 2 above.

7. Does VCI charge a fee to lift toll-blocking, and if so, what is the fee?

<u>Response</u>: VCI does not charge a fee to Lifeline customers to lift toll blocking.

8. Please explain why VCI's Lifeline customers cannot place 1+ toll calls.

<u>Response</u>: Lifeline customers that do not elect toll blocking can place 1+ toll calls through their established long distance carrier.

9. Please provide support for VCI's claim for USAC support in Florida for providing toll limitation service that is substantially larger than that being requested by all other carriers in Florida.

<u>Response</u>: First of all, VCI has more Lifeline customers than most other Florida carriers, thus its claim to USAC for all support would be higher than that made by many other Florida carriers.

Additionally, VCI is different than other phone companies in that VCI does not attempt to up-sell low-income consumers on expensive products such as long distance, voicemail, cellular phones, high speed internet, or other ancillary services that create high bills the consumer ultimately will be unable to pay causing services to be disconnected. VCI has seen from years of experience that when a customer's bill exceeds \$40 a month, more than half of those customers cannot pay and are then disconnected. VCI created a business model that attempts to keep the customer's bill below \$40 a month and part of that effort is educating the consumer about the benefits of keeping costs low.



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John Mann, Regulatory Analyst June 15, 2007 Page 6 of 6

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Docket No. 080065-TX Exhibit IT-2 (Page 126 of 128) Non-Confidential Portion of Audit Work Papers

Response to No. 9., Cont'd:

The vast majority of VCI customers call from pay phones because they have lost their phone service with another provider for non-payment of large bills. Most of the time, they are unable to re-establish services with that provider because the balance owing can be in the hundreds of dollars and/or they are refused service until the large past due bill and a hefty deposit are paid.

VCI actively educates its consumers about alternatives to long distance service. VCI encourages customers who have been disconnected for nonpayment of historical long distance bills to participate in Toll Limitation so no-one can run up their bill and they are not put at risk of losing their service again for non-payment of these large, often uncontrollable, costs. VCI also encourages customers to utilize low-cost calling cards from reliable sources such as WalMart or Costco in order to better manage long distance calling costs. VCI is unaware of other carriers that have the same commitment to consumer education.

Because VCI actively educates consumers and encourages low-income customers to utilize this very important cost management tool, VCI customers participate in toll blocking in larger numbers than those of other carriers.

Please don't hesitate to contact me if you have additional questions.

Sincerely, VCI Comhany Stan Efferding Secretary/Treas

SOURCE

25-5

VCI Company

Docket No. 080065-TX Exhibit IT-2 (Page 127 of 128) Non-Confidential Portion of Audit Work Papers

P.O. Box 98907 Lakewood, 11 4-98496-8907 Thone: (800) 923-8375 Tax: (253) 475-6328

Via Overnight Delivery

October 25, 2007

Intesar Terkawi, Auditor Florida Public Service Commission 2540 Shumard Oak Blvd. Tallahassee, Florida 32399-0850

Re: Audit Control No. 07-250-1-2

Dear Ms. Terkawi:

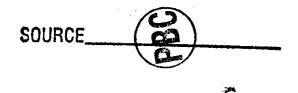
Attached is Vilaire Communications, Inc.'s (the "Company" or "VCI") Response to Audit Request No. 25.

Please acknowledge receipt of this Response by date stamping and returning the additional copy of this transmittal in the self-addressed, postage paid envelope provided for this purpose.

Questions regarding this Response may be directed to me at (253) 973-2476 or stanj@vcicompany.com.

Sincerely,

VCI Company



Vilaire Communications, Inc. Control No. 07-250-1-2 Phone Audit From June 1st, 2006 - June 30th, 2007 From June 1st, 2006 - June 30th, 2007 Description VC J VCS for so b Darment V. Contract 25

25-6

Audit Request No. 25

- 1. Please explain whether the toll limited service is actually being selected by a particular low income customer or is being required by the Carrier.
- 2. Please provide the support for either answer.

Response to: As stated in the Company's responses to the Florida Public Service Commission's letter of May 4, 2007, submitted in Response to Audit Request No. 6, Attachment E, the Company does not automatically enroll its customers in toll blocking. Potential customers who contact VCI to inquire about service listen to the following automated message:

> "Access to interexchange services are available upon request. Also, eligible customers may request toll blocking for free to prevent someone from running up your bill."

VCI's customer service representatives also read potential customers the following script prior to their initiation of service:

"VCI does not sell long distance service so you can either contact a long distance company to purchase your own long distance or you can choose to have a free toll block placed on your line so you never have to worry about someone running up your bill."

Please refer to Attachment E for additional information re: the Company's offering of toll limitation service to Florida consumers.

Vilaire Communications, Inc. Phone Audit Control No. 07-250-1-2 From June 1st, 2006 - June 30th, 2007 Description VCI response & Downend Frank 25

SOURCE

25-7

DOCKET NO. 080065-TX: Investigation of Vilaire Communications, Inc.'s eligible telecommunications carrier status and competitive local exchange company certificate status in the State of Florida.

S. . . .

WITNESS: Direct Testimony Of Intesar Terkawi, Appearing On Behalf Of Staff

EXHIBIT IT-3: Confidential Portion of Audit Work Papers

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DOCUMENT NUMBER-DATE 02802 APR 108 FPSC-COMMISSION CLERK

Docket No. 080065-TX Exhibit IT-3

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CONFIDENTIAL EXHIBIT IT-3

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