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October 14, 2014

**Via E-Filing**

Patricia Van Gerpen, Executive Director  
South Dakota Public Utilities Commission  
Capital Building, 1st Floor  
500 East Capital Avenue  
Pierre, South Dakota 57501-5070

**Re: Docket No. TC14-082 - Talk America Services, LLC Application for Certificate of Authority to Provide Resold Local Exchange and Interexchange Telecommunications Services in the State of South Dakota**

Dear Ms. Van Gerpen:

Pursuant to correspondence from staff dated October 9, 2014 and in support of its Application for a Certificate of Authority (“Certificate”) to Provide Resold Local Exchange and Interexchange Telecommunications Services, Talk America Services, LLC (“TAS” or “Applicant”) provides the South Dakota Public Utilities Commission (“Commission”) with the following supplemental information:

- 1-1) Explain the process the company has for resolving complaints received from a customer. Include estimation on how long it takes for a complaint, on average, to be resolved.

**RESPONSE: Customers can submit complaints to the Company by calling its toll free number or sending a written dispute to its address. Once a complaint is received, associates review account records to resolve the complaint. The Company will make best efforts to address customer complaints within fourteen (14) days of receiving the complaint.**

- 1-2) Does the company have a copy of the request for interconnection that Windstream has made with CenturyLink? If so, provide a copy.

**RESPONSE: TAS will initially only be reselling the services of the Windstream operating companies. Windstream has an interconnection agreement in place with CenturyLink. This agreement was filed and approved in Commission’s Docket TC99-057 and amended in Docket TC11-006.**

- 1-3) On page 9 of the application, in section (15) it states that the company does not currently seek to offer service in rural areas. On page 7 of the application, at the bottom of section (9) and on page 12, section (23) it states that the company is

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seeking state wide authority. Clarify if the company is looking for certification state wide, in both CenturyLink and rural areas, in this application or certification for just for the CenturyLink territories.

**RESPONSE: The Company requests certification to provide services in the CenturyLink territories only.**

- 1-4) If the company is in fact seeking a certificate of authority to provide local exchange service on a state wide basis, provide a response to ARSD 20:10:32:03(15) explaining how the company will meet all requirement contained in that rule.

**RESPONSE: Not applicable. See response to Question 1-3 above.**

- 1-5) Pursuant to ARSD 20:10:32:03(19) and 20:10:24:02(12), what policies does the company have relating to the solicitation of new customers?

**RESPONSE: The company will solicit new customers through word of mouth referrals and direct mail campaigns and will likely use its website as well as refer a friend promotions to attract new customers. The Company will not use multilevel marketing.**

**The Company will ensure that all customer orders to switch their local and/or long distance services are verified using written or online LOAs or a third-party verification (TPV) and will comply with all federal and state requirements for obtaining such customer authorization.**

- 1-6) In regard to section (21) on page 19 of the application, will the company be including the rates, terms and conditions of service on its direct mailings that are referenced in section (14) of the application?

**RESPONSE: All rates, terms and conditions of services will be posted on the Company's website. The website at this time is not currently running but will be in place prior to the Company providing services.**

- 1-7) In regard to section (8) on page 6, it says one of the services the company is looking to provide is alternate operator service. If the company is in fact seeking to provide alternate operator service see ARSD 20:10:24:05 and file the proper paperwork required by that rule.

**RESPONSE: The Company has determined that it does not request authority to provide alternate operator services at this time. To the extent the company wants to provide such services in the future it will request such authority from the Commission at that time.**

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- 1-8) Pursuant to ARSD20:10:32:03(12) and 20:10:24:02(9), provide a cash flow statement. If a cash flow statement is unavailable since this is a new startup company, would the company like to request a waiver of the cash flow statement portion of the rules?

**RESPONSE: As a newly formed company, TAS does not currently have a cash flow statement available. As such, the company hereby requests a waiver of ARSD20:10:32:03(12) and 20:10:24:02(9). TAS respectfully asserts that the financial information provided with its Application demonstrates that it has the financial capability to provide services in South Dakota.**

- 1-9) Since this date the application was created, has the company been granted a certificate of authority for either interexchange or local exchange service in any other states? Has the company been denied in any states?

**RESPONSE: The Company has not had any certification application denied. The Company has been granted certification in Alabama on September 30, 2014, and Iowa on October 7, 2014.**

A copy of this filing has been submitted electronically. Please date-stamp the enclosed extra copy and return it in the envelope provided. Should you have any questions concerning this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,



Russell M. Blau  
Jeffrey R. Strenkowski

Counsel for Talk America Services, LLC