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AZ CORP COMMISSION
DOCUMENT CONTROL

August 18, 2004

Docket Control Center
AZ Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007-2927

RE: TransWorld Network, Corp
Docket: T-04246A-04-0201
Response to second set of data requests

To Whom It May Concern:

Enclosed please find for filing an original and 13 copies of the responses to information requested in Staff's second data request, dated July 19, 2004.

The response has been submitted with a cover sheet, as is required.

I have also enclosed an extra copy of this letter to be date stamped and returned to me in the enclosed, self-addressed, postage paid envelope. If you have any questions, or if I may provide you with additional information, please do not hesitate to contact me. I can be reached at (813) 890-2207 from 8:00am to 5:00pm EST.

Respectfully submitted,

Lourdes Viñas
Director, Regulatory & Compliance

Enclosures

Arizona Corporation Commission
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DOCKET NO. T-04246A-04-0201

TRANSWORLD NETWORK, CORP
RESPONSES TO STAFF'S SECOND SET OF DATA REQUESTS

- 1. Please explain how your company calculated the maximum and minimum rates for each of your proposed services.

Ranges were calculated by comparing a blend of competitive alternatives.

- 2. Please indicate why you believe that your range of rates is just and reasonable using a competitive market analysis. Your analysis may contain publicly available examples of rates charged by the incumbent or other carriers for similar services or any other information that you believe demonstrates that your rates are just and reasonable. Please include any supporting materials.

TransWorld Network, Corp ("TWN") rates are just and reasonable on the basis of a selection of 5 alternative carriers' competitive prices, including: PNG, Primus, Sprint, AT&T, and MCI.

TWN's 8.9 cents per minute rate for intrastate direct dialed long distance calls proved to be well below the competitions' range of 10-18 per minute. In comparison to the carriers offering Intrastate toll-free service, TWN's 8.9 cents per minute was again well below the 13.9-14.9 cents per minute rates of the competition. In regards to Calling Card calls, TWN's 12 cents per minute rate falls at the lower end of the 10-25 cents per minute rates of the competition. Incidentally, TWN charges no per call fees, where some of the competitors evaluated do.

- 3. Please indicate why you believe that your actual range of rates is just and reasonable using a fair value or cost basis. Please include economic justification or cost support data.

Given rising access, termination, and regulatory costs, TWN believes that in order to fairly state its range of rates, it needs to keep its high end figures comparative to the higher actual rates of some of the competing carriers in the marketplace.

- 4. Please submit a copy of your tariff setting forth your actual rates and charges.

A copy of the tariff setting forth actual rates and charges was submitted as Attachment B of TWN's Application for Authority.

- 5. Please identify any other jurisdictions in which your company or an affiliate provides similar services. Please specify the rates that your company and/or affiliate charge for these similar services in these other jurisdictions. If there is a difference between the rates that your company is proposing for its Arizona operations and the rates that your company and/or affiliate charges in other jurisdictions for similar services, please identify and indicate the amount of the difference and explain why you are proposing different rates in Arizona.

TWN provides similar intrastate service in 37 other states. Where the rates differ in a material fashion, the differences can be attributed to access, termination, and regulatory costs that are unique to each state.

- 6. Please identify any other jurisdictions in which your company or an affiliate is applying to provide similar services. Please specify the rates that your company and/or affiliate proposes to charge for these similar services in these other jurisdictions. If there is a difference between the rates that your company is proposing for its Arizona operations and the rates that your company and/or affiliate is proposing to charge in other jurisdictions for similar services, please identify and indicate the amount of the difference and explain why you are proposing different rates in Arizona.

TWN does not have any other outstanding applications at this time.

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