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March 2, 2005

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Mr. Brett Ferenchak
Swidler Berlin, LLP
3000 K Street, N.W., Suite 300
Washington, D.C. 20007-5116

RE: Staff's Letter of Insufficiency and First Set of Data Requests to ATX Licensing, Inc.
Docket No. T-04310A-05-0127

Dear Mr. Ferenchek:

On February 28, 2005, ATX Licensing, Inc. ("ATX") filed an application for a Certificate of Convenience and Necessity ("CC&N") to provide telecommunication services in the State of Arizona. The application is not yet sufficient. This data request lists the information Staff needs to complete its analysis of your application. Please treat this, as Staff's first set of data requests to ATX the above-referenced matter.

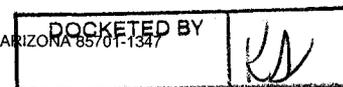
For purposes of this data request set, the words "ATX", "Applicant", "the Company", "you", and "your" refer to ATX Licensing, Inc. and any representative, including every person and/or entity acting with, under the control of, or on behalf of ATX Licensing, Inc. For each answer, please identify by name, title, and address each person providing information that forms the basis for the response provided.

These data requests are continuing, and your answers or any documents supplied in response to these data requests should be supplemented with any additional information or documents that come to your attention after you have provided your initial responses.

Please provide Docket Control with the information being requested within **60 days** of the date of this letter. Mail an original plus 13 copies to Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007-2927. If no response is received or all deficiencies are not remedied within 60 days, Staff will recommend that the application be terminated as per Rule R14-2-1103(B)3 and R14-2-510(E)3. If the application is terminated, the Applicant cannot provide the same telecommunications services in Arizona for which it is currently applying, until such time as a new application is filed with and approved by the Commission.

Arizona Corporation Commission
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Remember that information submitted for a CC&N will be made a part of the public record (including financial statements). Any information designated as confidential will not be accepted by Docket Control. If you have any questions, please contact me at (602) 364-0235. Thank you for your prompt response to this request.

Respectfully,

A handwritten signature in black ink, appearing to read 'AL', with a long horizontal flourish extending to the right.

Adam Lebrecht
Executive Consultant I
Utilities Division

Enclosure(s)

CC: Docket Control Center (Original and Thirteen Copies)

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STAFFS FIRST SET OF DATA REQUESTS FOR
ATX LICENSING, INC.
DOCKET NO. T-04310A-05-0127

Please make sure each numbered item and each part of the item is answered completely. In order for Staff to continue with its review of this application, the following information must be submitted:

1. Please explain how your company calculated the actual maximum and actual minimum rates that will be contained in your tariffs for each of your services.

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 actual rates are just and reasonable. Please include any supporting materials. For a list of telecommunications carriers certificated in Arizona, go to www.cc.state.az.us/utility/utility for a list of Commission-approved telecommunications rates and tariffs, go to www.cc.state.az.us/utility/tariffs.

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

4. Please submit a copy of ATX's Certificate of Good Standing refer to item (A-8) of the application form.

5. Please submit a copy of ATX's affidavit of publication indicating that ATX has published legal notice of this application in the counties where the authority to provide service is requested.

6. Please provide a financial statement reflecting the 12 month period ending December 31, 2004.

7. Please describe in as much detail as possible exactly how ATX was not aware that it was providing service to customers in Arizona. Also, please indicate if there are any other states in which ATX provides service without having a CC&N.