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August 29, 2005

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2005 AUG 29 1 P 3: 01

RECEIVED

Ms. Monica Haab
Nowalsky, Bronston & Gothard
3500 North Causeway Boulevard, Suite 1442
Metairie, Louisiana 70005

RE: Staff's Letter of Insufficiency and Third Set of Data Requests to Vanco Direct USA, LLC
Docket No. T-20404A-05-0599

Dear Ms. Haab:

On August 22, 2005, Vanco Direct USA, LLC ("Vanco") 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 Vanco in the above-referenced matter.

For purposes of this data request set, the words "Vanco", "Applicant", "the Company", "you", and "your" refer to Vanco Direct USA, LLC and any representative, including every person and/or entity acting with, under the control of, or on behalf of Vanco Direct USA, LLC. 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.

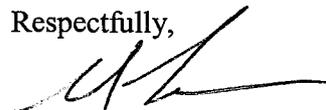
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Remember that information submitted for a CC&N will be made a part of the public record (including financial statements). Any information designated as confidential will not be accepted by Docket Control. If you have any questions, please contact me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

Respectfully,



Adam Lebrecht
Executive Consultant I
Utilities Division

Enclosure(s)

CC: Docket Control Center (Original and Sixteen Copies)

STAFFS FIRST SET OF DATA REQUESTS FOR
VANCO DIRECT USA, LLC
DOCKET NO. T-20404A-05-0599

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. Vanco indicated in its application that it was seeking the authority to provide resold interexchange and resold local exchange service in the State of Arizona. However, Vanco's proposed tariff only indicates the services of resold interexchange and private line services. Please indicate if Vanco is seeking the authority to provide private line services and/or resold local exchange services in the State of Arizona. If Vanco is seeking the authority to provide resold local exchange service in the State of Arizona, please submit a proposed tariff indicating rates for this service.
5. Please submit financial statements in which the amounts indicated are U.S. Dollars.
6. Please indicate when Vanco plans on offering service in the States in which it has been granted the authority to provide service.
7. Please indicate if Vanco will be offering service to residential and/or business customers in Arizona.