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Arizona Corporation Commission
July 9 2001

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VIA REGULAR MAIL

Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2996

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Re: ***Business Discount Plan, Inc.***
Docket No. T-03142A-96-0201; Decision NO. 63625

Gentlemen:

This letter is submitted on behalf of Business Discount Plan, Inc. ("BDP"), and is in reference to your letter of June 27, 2001, concerning the above-referenced docket.

On May 23, 2001, BDP filed with the Arizona Corporation Commission an interim report on the status of Notice of Apparent Liability issued by the Federal Communications Commission ("FCC") and notification of date in which BDP will begin or has begun providing service to Arizona customers in compliance with the above-referenced Commission Decision. In this filing, BDP showed that it had begun providing resale long distance service in Arizona in 1995, pursuant to the then existing Commission requirements applicable to resellers of long distance service. BDP also advised the Commission that BDP had continued to provide resold intrastate telecommunications services to Arizona customers since it first began offering resold long distance service in 1995, and since the filing of its application for a Certificate of Public Convenience and Necessity in 1996. BDP also has a tariff on file which became effective and prior to the effective date of the above-referenced Commission Decision, with the Commission covering such service.

The Commission's letter of June 27, 2001, indicates that BDP has not complied with the Commission's Decision referenced above, and that BDP Certificate of Convenience and Necessity did not issue and is void. The Commission's letter further states that if BDP intended to provide service in the future in Arizona, it must either file a new application for Certificate of Public Convenience and Necessity or obtain an extension of time to comply from the Commission.

The undersigned has been in contact with the Commission's staff on this matter. The Staff has advised that BDP is required to refile its existing tariff with a new effective date, and a filing containing the calculation of its Fair Value Rate Base. Accordingly, BDP requests an extension of time to comply with the Commission's Decision in these respects. The reason the additional time needed is that BDP did not understand from the Commission's Decision the Commission's requirement for the refiling of BDP's existing tariff, and the filing of the

Arizona Corporation Commission
July 3, 2001
Page 2

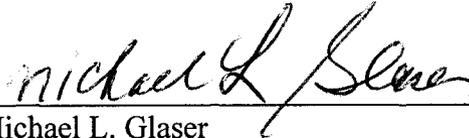
computation of the Fair Value Rate Base. BDP was previously advised by the Commission's staff that filing a Fair Value Rate Base was under litigation in the Arizona courts, and that BDP would not have to file such information unless the court mandated such requirements, and then within 30 days of the court's decision.

Nonetheless, BDP will refile its tariff with the Commission with a new effective date, and compute its Fair Value Rate Base determined from BDP's out-of-state assets prorated for use in Arizona. BDP requests an extension until July 31, 2001 to make such a filing.

BDP will appreciate your prompt response to this request for extension.

Very truly yours,

LOTTNER RUBIN FISHMAN BROWN & SAUL, P.C.



Michael L. Glaser

MLG/kc

Enclosures

cc: Docket Control
Patrick C. Williams, Manager
Compliance and Enforcement
Utilities Division
Arizona Corporation Commission