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TO: Docket Control  
Arizona Corporation Commission

FROM: Steve Olea *Mark D. Olea* /FOR  
Acting Director  
Utilities Division

DATE: October 19, 2001

RE: **COMPLIANCE TO DECISION NO. 63928** – REQUEST FOR EXTENSION OF TIME. (DOCKET NO. T-03903A-00-0511)

On September 27, 2001, Looking Glass Networks, Inc. ("LGN") submitted correspondence requesting an extension of time to comply with two conditions in the decision granting LGN authority to provide facilities-based and resold local exchange and interexchange telecommunications services (Decision No. 63928). LGN's Certificate of Convenience and Necessity was conditioned on the Company 1) certifying that all issues associated with the provision of 911 service have been resolved with the emergency service providers and 2) filing its plan to have its customers' telephone numbers included in the incumbent's Directories and Directory Assistance databases within 30 days of an Order in this matter. LGN requests an extension to 30 days prior to offering local exchange service in Arizona to comply with both of these conditions. LGN states that it is in the process of negotiating an interconnection agreement. This interconnection agreement will, among other things, satisfy these two conditions.

Staff recommends that LGN's request for an extension of time be granted because it is not necessary for LGN to comply with the above two provisions if they are not currently or soon to be providing service to Arizona customers. Therefore, Staff recommends that LGN comply with the above two conditions by January 31, 2002, or 30 days prior to the provision of local exchange service, whichever comes first.

Originator: Marta Kalleberg

Enclosures

Arizona Corporation Commission

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OCT 19 2001

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Service List for: Looking Glass Networks, Inc.  
Docket No. T-03903A-00-0511

Ms. Elizabeth A. Dees  
Associate Counsel  
Looking Glass Networks, Inc.  
1111 West 22<sup>nd</sup> Street, Suite 600  
Oak Brook, Illinois 60523

Mr. Ronald W. Del Sesto  
Swidler Berlin Shereff Friedman, LLP  
3000 K Street, North West, Suite 300  
Washington, District of Columbia 20007-5116

Mr. Timothy Berg  
Fennemore Craig  
3003 North Central Avenue, Suite, 2600  
Phoenix, Arizona 85012

Mr. Christopher C. Kempley  
Chief, Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Mr. Steven M. Olea  
Acting Director, Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007

Ms. Lyn Farmer  
Director, Hearing Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, Arizona 85007



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September 26, 2001

VIA FEDERAL EXPRESS

Docket Control  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

**Re: Docket No. T-03903A-00-0511; Decision No. 63928 – Looking Glass Networks, Inc.’s Request for Extension of Time**

Dear Docket Control:

On August 6, 2001, Looking Glass Networks, Inc. (“LGN”) received authority from the Commission to provide competitive facilities-based and resold local exchange, interexchange and access telecommunications services. On September 11, 2001, the Manager of the Compliance and Enforcement Utilities Division, Mr. Patrick Williams, sent a letter titled “Letter of Non-Compliance” to LGN indicating that LGN was delinquent in complying with two post-certification requirements. Specifically, Mr. Williams indicated that: (a) LGN had failed to timely file a plan to have its customers’ telephone numbers included in the ILEC’s directories and directory assistance databases and (b) LGN had not certified, through the 911 service provider in the area in which it intends to provide service, that all issues associated with the provision of 911 service have been resolved. Pursuant to the Letter of Non-Compliance, LGN respectfully requests an extension of time to comply with both requirements.

Including LGN’s customers in the ILEC’s directories and directory assistance databases will be provided for in the interconnection agreement that LGN ultimately enters into with Qwest, the ILEC serving the State of Arizona. Similarly, the provision of 911 service will be set forth in the interconnection agreement with Qwest. At this time, LGN is still in the process of evaluating existing interconnection agreements between Qwest and competitive carriers, as well as the Sixth Revision of Qwest’s Statement of the Generally Available Terms for Interconnection, Unbundled Network Elements, Ancillary Services and Resale of Telecommunications Services (“SGAT”) for the State of Arizona. The Ancillary Services portion of the Arizona SGAT addresses all issues associated with including LGN’s customers in the ILEC’s directories and directory assistance databases. Further, the Ancillary Services section also addresses all issues associated with the provision of 911 service. Should LGN adopt an interconnection agreement between Qwest and another competitive carrier, LGN will ensure that the interconnection agreement includes provisions pertaining to 911 service and provides for a method of including LGN customers in the ILEC directories and directory assistance databases.

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September 26, 2001

Since LGN has not yet entered into an interconnection agreement with Qwest, the Company is unable to comply with the post-certification compliance action items detailed in the September 11, 2001 letter from Mr. Williams. LGN respectfully requests that the Commission not require LGN to submit either its 911 plan or its plan to have customers' telephone numbers included in the ILEC's directory and directory assistance databases until thirty (30) days prior to LGN's provision of local exchange service to the public in the State of Arizona. LGN also respectfully requests that it be treated the same as other new entrants in Arizona who, as LGN understands, are in the process of building and establishing networks for the provision of non-switched telecommunications services and have been granted similar extensions.

Enclosed please find an original and eleven (11) copies of this filing. Please date-stamp and return the extra copy in the enclosed prepaid envelope. Should you have any questions concerning this filing, please do not hesitate to contact Elizabeth Dees at 630-242-2065. It is LGN's understanding that the Commission will grant or deny this request for an extension of time in an Order.

Respectfully,



Elizabeth A. Dees  
Associate Counsel  
Looking Glass Networks, Inc.

cc: Patrick C. Williams, Manager, Compliance and Enforcement  
Jodi J. Caro, Vice President and General Counsel  
Ronald W. Del Sesto, Jr. – Swidler Berlin Shereff Friedman, LLP