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January 5, 2006

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Via DHL Overnight Express Mail  
AZ CORP COMMISSION  
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Arizona Corporation Commission  
Docket Control – Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

RE: Eschelon Telecom of Arizona, Inc. Responses to Staff's Revised Third Set of Data Requests to Telecommunications Companies  
Docket No. RT-00000J-02-0066 (CPNI)

Dear Docket Control Administrator:

Enclosed for filing is the original and 13 copies of Eschelon Telecom of Arizona, Inc.'s Responses to Arizona Corporation Commission Staff's Revised Third Set of Data Requests in the above-referenced docket.

Please feel free to contact me with any questions.

Sincerely,

Catherine A. Murray  
Manager, Regulatory Affairs  
Eschelon Telecom, Inc.  
612.436.1632 (direct)  
612.436.1732 (fax)  
camurray@eschelon.com

Enclosure

cc: Caroline A. Butler, w/enclosure (DHL Express Mail and electronically)  
Wilfred Shand, w/enclosure (DHL Express Mail and electronically)

**BEFORE THE ARIZONA CORPORATION COMMISSION**  
**RECEIVED**

JEFF HATCH-MILLER  
CHAIRMAN  
WILLIAM A. MUNDELL  
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MIKE GLEASON  
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KRISTIN K. MAYES  
COMMISSIONER

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AZ CORP COMMISSION  
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IN THE MATTER OF DISSEMINATION ) DOCKET NO. RT-00000J-02-0066  
OF INDIVIDUAL CUSTOMER )  
PROPRIETARY NETWORK )  
INFORMATION BY )  
TELECOMMUNICATIONS CARRIERS )

**RESPONSES OF ESCHELON TELECOM OF ARIZONA, INC. TO  
STAFF'S REVISED THIRD SET OF DATA REQUESTS  
TO TELECOMMUNICATIONS COMPANIES**

Eschelon Telecom of Arizona, Inc. (Eschelon), submits the following responses to the Arizona Corporation Commission Staff's Revised Third Set of Data Requests.

**STF 3.1** Please indicate whether any unaffiliated company(s) or individual(s) have obtained copies of any individual customer CPNI of your Company or any of its affiliates through opt-in approval.

**RESPONSE: To the best of my knowledge no unaffiliated companies or individuals that have obtained individual customer CPNI from Eschelon or any of its affiliates.**

**STF 3.2** If your response to Question 1 is "yes", please provide the names of all unaffiliated companies that have obtained copies of any individual customer CPNI of your Company or any of its affiliates through opt-in approval.

**RESPONSE: Not applicable.**

**STF 3.3** For each company listed in your response to Question 2, please indicate what the unaffiliated company intends to use the individual customer CPNI for.

**RESPONSE: Not applicable.**

**STF 3.4** For each company listed in response to Question 2 above, please indicate the number of individual customer CPNI records that the unaffiliated has access to?

**RESPONSE: Not applicable.**

**STF 3.5** Please indicate whether any unaffiliated company(s) have obtained copies of any individual customer CPNI of your Company or any of its affiliates without obtaining opt-in approval.

**RESPONSE: To the best of my knowledge, there have been no unaffiliated companies or individuals that have obtained individual customer CPNI from Eschelon or any of its affiliates.**

**STF 3.6** If your response to Question 5 is "yes", please list the unaffiliated company(s) that you are aware of that have obtained copies of any individual customer CPNI of your Company, or any of its affiliates without obtaining opt-in approval.

**RESPONSE: Not applicable.**

**STF 3.7** For each company listed in your response to Question 6, please indicate if the unaffiliated company is offering the individual customer CPNI for sale to the public?

**RESPONSE: Not applicable.**

**STF 3.8** If your response to Question 5 is "yes", and for each unaffiliated company listed in Question 6, please indicate how the unaffiliated company(s) obtained the individual CPNI of your Company or any of its affiliates?

**RESPONSE: Not applicable.**

**STF 3.9** For each company listed in your response to Question 6, please indicate approximately how many individual customer CPNI records were unlawfully obtained by the unaffiliated company.

**RESPONSE: Not applicable.**

**STF 3.10** For all of the companies listed in your response to Question 6, please indicate what steps you have taken to get the unlawfully obtained individual customer CPNI records back into your possession.

**RESPONSE: Not applicable.**

**STF 3.11** If your Company has filed a complaint or requested an injunction by a court, please provide copies of all briefs that your company and the defendant unaffiliated company files; along with a copy of any court order.

**RESPONSE: Not applicable.**

**STF 3.12** If your answer to Question 5 was yes, please indicate with specificity what steps you have instituted internally at your Company to ensure this sort of breach does not occur again in the future?

**RESPONSE: Not applicable.**

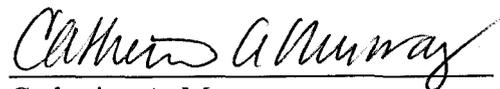
**STF 3.13** Please refer to the attached news releases in responding to A through E.

- A. Has your Company experienced any breaches of security of this nature that you are aware of?
- B. Please describe how any such breaches involving your Company are occurring.
- C. Please indicate whether you have done any investigations to determine whether your Company's CPNI is being sold on any websites.
- D. If your response to question "C" is no, please indicate why you have not done any such investigation.
- E. Please indicate how you intend to prevent such breaches in the future.

**RESPONSE:**

- A. **No.**
- B. **Not applicable.**
- C. **Eschelon has not done an investigation of this nature.**
- D. **Eschelon has never experienced such a breach and therefore has had no reason to perform this type of investigation.**
- E. **Eschelon believes its records are very well secured. Further, the employees and consultants who have access to such sensitive information are under strict non-compete and confidentiality agreements with the Company.**

Dated this 5<sup>th</sup> day of January, 2006.



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