



ORIGINAL



0000044424

7901 Lowry Blvd. Denver, CO 80230
W > <http://www.covad.com>

T > 720.670.2018
F > 720.670.3350

March 6, 2006

Via UPS Overnight Delivery

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

Re: Docket No. RT-00000J-02-0066

Dear Sir/Madam:

Enclosed please find the original and 15 copies of Covad's Answers to Staff's Revised Third Set of Data Requests in the above referenced docket. The appropriate cover sheet is also enclosed.

Please feel free to contact me if you have any questions.

Very truly yours,


Lynn Hankins

Encls.

cc: Maureen Scott

AZ CORP COMMISSION
DOCUMENT CONTROL

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BEFORE THE ARIZONA ~~RECEIVED~~ COMMISSION

COMMISSIONERS

JEFF HATCH-MILLER, Chairman
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

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AZ CORP COMMISSION
DOCUMENT CONTROL

IN THE MATTER OF)	Docket No. RT-00000J-02-0066
DISSEMINATION OF INDIVIDUAL)	
CUSTOMER PROPRIETARY)	COVAD'S ANSWERS TO
NETWORK INFORMATION BY)	STAFF'S REVISED THIRD
TELECOMMUNICATIONS)	SET OF DATA REQUESTS TO
CARRIERS)	TELECOMMUNICAITONS
)	COMPANIES

DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad")

answers staff's revised third set of data requests as follows:

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.

ANSWER:

No.

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.

ANSWER:

NA

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.

ANSWER:

NA

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?

ANSWER:

NA

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.

ANSWER:

No

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.

ANSWER:

NA

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?

ANSWER:

NA

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 customer CPNI of your Company or any of its affiliates?

ANSWER:

NA

STF3.9 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.

ANSWER:

NA

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.

ANSWER:

NA

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 filed; along with a copy of any court order.

ANSWER:

NA

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?

ANSWER:

NA

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?

ANSWER:

No

B. Please describe how any such breaches involving your Company are occurring.

NA

C. Please indicate whether you have done any investigations to determine whether your Company's CPNI is being sold on any websites.

ANSWER:

No

D. If your response to question "C" is no, please indicate why you have not done any such investigation.

ANSWER:

Covad has not experienced any incidents relating to the sale of its customer information on any website nor is Covad, to the best of its knowledge, aware of any incidents relating to the sale or attempted sale of its customer information. Consequently, Covad has no business need or justification to conduct such an investigation.

E. Please indicate how you intend to prevent such breaches in the future.

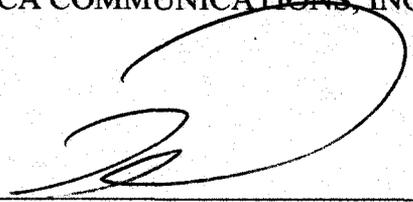
ANSWER:

NA

RESPECTFULLY SUBMITTED,

Dated: March 6, 2006

DIECA COMMUNICATIONS, INC.

By: 

Gregory Diamond
Senior Counsel
Covad Communications Company
7901 Lowry Boulevard
Denver, CO 80230
(720) 670-1069
(720) 670-3350 Fax