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ARIZONA CORPORATION COMMISSION

OLD

April 4, 2006

Patrick D. Crocker
EARLY, LENNON, CROCKER & BAR OSIEWICZ, P.L.C.
900 Comerica Building
Kalamazoo, MI 49007

RE: Staff's Letter of Insufficiency and Second Set of Data Requests to IBFA Acquisition Company, LLC
(Docket No.: T-04314A-05-0338)

Dear Mr. Crocker,

I have been assigned to complete the review of the Certificate of Convenience and Necessity ("CC&N") application filed by IBFA Acquisition Company, LLC ("IBFA"), T-04314A-05-0338. This application was originally assigned to an analyst no longer with the Arizona Corporation Commission.

On May 12, 2005, IBFA Acquisition Company, LLC ("IBFA") filed an application for a 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 second set of data requests to IBFA in the above-referenced matter. Answers or 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 West Washington Street, Phoenix, Arizona 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.

If you have any questions, please contact me via phone at (602) 542-0742 or via email at afimbres@azcc.gov. Thank you for your prompt response to this request.

Respectfully,

Armando Fimbres
Public Analyst
Utilities Division

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DOCUMENT CONTROL

2006 APR -4 P 3:10

RECEIVED

Enclosure(s)

**ARIZONA CORPORATION COMMISSION
STAFF'S SECOND SET OF DATA REQUESTS TO
IBFA ACQUISITION COMPANY, LLC, ("IBFA")
Docket T-04314A-05-0338**

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:

STF 2.1 Staff has no record of the affiliate noted in (A-20) of IBFA's application. Please explain when IBFA's affiliate, noted below, began providing telecommunications services in Arizona.

American Farm Bureau, Inc.
1850 Howard Street, Suite C
Elk Grove Village, IL 60007

STF 2.2 Please provide the number of "direct or non-contract" IBFA employees and their associated years of telecommunications experience in the following categories:

- 1 - Executive & Management
- 2 - Sales & Marketing
- 3 - Operations
- 4 - Information Technology

STF 2.3 Please provide the number of "contract" IBFA employees and their associated years of telecommunications experience in the following categories:

- 1 - Executive & Management
- 2 - Sales & Marketing
- 3 - Operations
- 4 - Information Technology

STF 2.4 The tariff submitted in IBFA's application is not structured around maximum and actual rates. Does IBFA understand that its actual rates will be also be considered maximum rates, necessitating that IBFA apply for maximum rate increases whenever IBFA proposes to increase actual rates?

STF 2.5 Please explain the date when IBFA began providing services in the following states.

Indiana	Utah	Oregon
New Jersey	Michigan	Wisconsin
Texas	North Dakota	New Hampshire
Iowa	Virginia	Pennsylvania
North Carolina	Montana	Wyoming

STF 2.6 If IBFA has initiated resold long distance service in Arizona, Minnesota or Washington, please provide the corresponding date(s) when service was initiated.