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JAMES G. JAYNE  
Executive Secretary

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ARIZONA CORPORATION COMMISSION

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June 17, 2003  
Arizona Corporation Commission

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JUN 17 2003

Barbara Vonderheid  
Motion Telecom, Inc.  
701 S. Fulton Street, Suite 200  
Englewood, Colorado 80112

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RE: Staff's First Set of Data Requests to Motion Telecom, Inc. Docket No. T-4186A-03-0406

Dear Ms Vonderheid:

On June 12, 2003 Motion Telecom, Inc. ("Motion") filed an application for a CC&N to provide telecommunication services in the State of Arizona. The application is not sufficient. This data request lists the information Staff needs to complete its analysis of your application. Please treat this, as Staff's first set of data requests to Motion in the above-referenced matter.

For purposes of this data request set, the words "Motion", "Applicant", "the Company", "you", and "your" refer to Motion Telecom, Inc. and any representative, including every person and/or entity acting with, under the control of, or on behalf of Motion Telecom, Inc. For each answer, please identify by name, title, and address each person providing information that forms the basis for the response provided.

These data requests are continuing, and your answers or any 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.

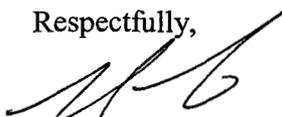
Please provide Docket Control with the information being requested within **60 days** of the date of this letter. Mail an original plus 13 copies to Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007-2927. If no response is received or all deficiencies are not 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.

June 17, 2003

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Remember that information submitted for a CC&N will be made a part of the public record (including financial statements). Any information designated as confidential will not be accepted by Docket Control. If you have any questions, please contact me at (602) 364-0235. Thank you for your prompt response to this request.

Respectfully,



Adam Lebrecht  
Executive Consultant I  
Utilities Division

Enclosure(s)

CC: Docket Control Center (Original and Sixteen Copies)

STAFF'S FIRST SET OF DATA REQUESTS TO  
MOTION TELECOM, INC.  
DOCKET NO. T-4186A-03-0406

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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:

1. Since you are not approved to offer or currently do not offer telecommunications services in other states, please list the number of employees you have and their years of experience in the telecommunications industry.
2. Submit copies of affidavits of publication that the Applicant has, as required, published legal notice of the Application in all counties where authority to provide service is requested. Refer to item (A-16) on the new CC& N application form.
3. Please answer parts 1-5 of item (B-4) of the application form.
4. Indicate if the Applicant or any of its officers, directors, or partners have been or are currently involved in any formal or informal complaint proceedings pending before any state or federal regulatory commission, administrative agency, or law enforcement agency. Describe in detail any such involvement.
5. Indicate if the Applicant or any of its officers, directors, or partners have been or are currently involved in any civil or criminal investigation. Describe in detail any such involvement.
6. Indicate if the Applicant or any of its officers, directors, or partners had judgments entered in any civil matter, judgments levied by any administrative or regulatory agency, or been convicted of any criminal acts within the last ten (10) years. Describe in detail any such judgments or convictions.
7. Please submit a copy of the Applicant's Certificate of good Standing as a foreign corporation in Arizona. Refer to item (A-8) of the application form.