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2006 NOV 22 P 1:00

November 22, 2006  
AZ CORP COMMISSION  
DOCUMENT CONTROL

Edward Gothard  
Nowalsky, Bronston & Gothard  
3500 North Causeway Boulevard  
Suite 1442  
Metairie, Louisiana 70002

RE: Staff's Letter of Insufficiency and Third Set of Data Requests to Adelphia  
Telecommunications, Inc. and Telecom Management, Inc. d/b/a Pioneer Telephone  
Docket Nos. T-03828A-05-0353, T-03828A-05-0721, and T-04277A-05-0721

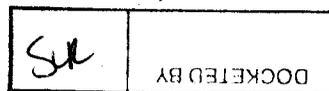
Dear Mr. Gothard:

On June 6, 2006 the Hearing Division ordered that the above dockets be consolidated. The Application you submitted is not sufficient. This data request lists the information Staff needs to complete its analysis of your Application.

For purposes of this data request set, the words "TMI", "Applicant", "the Company", "you", and "your" refer to Telecom Management, Inc. d/b/a Pioneer Telephone any representative, including every person and/or entity acting with, under the control of, or on behalf of Telecom Management, Inc. d/b/a Pioneer Telephone. **For each answer, please identify by name, title, telephone number, e-mail address, 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 **30 business days** of the date of this letter. Mail an Original plus 15 copies to Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007-2927.



NOV 22 2006

DOCKETED  
Arizona Corporation Commission

Respectfully,

*John F. Bostwick*

John F. Bostwick  
Administrative Services Officer II  
Utilities Division

Enclosure(s)

CC: Docket Control Center (Original and Fifteen Copies)

STAFF'S THIRD SET OF DATA REQUESTS TO  
ADELPHIA TELECOMMUNICATIONS, INC. AND TELECOM MANAGEMENT, INC.  
D/B/A PIONEER TELEPHONE  
DOCKET NOS. T-03828A-05-0353, T-03828A-05-0721, AND T-04277A-05-0721

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Please make sure each numbered item and each part of the item is answered completely. If it is not, Staff will resubmit the numbered item(s) and/or part(s) of the item in a following data request. Also, please make sure all information you provide in response to item(s) concerning this Application, including Staff's data requests, is updated and current. If you need to update your response to any item(s)/request(s), please reference the item(s)/request(s) and provide your current response(s). In order for Staff to continue with its review of this application, the following information must be submitted:

- JFB3-1 Please indicate if Telecom Management, Inc. d/b/a Pioneer Telephone's ("TMI" and "Pioneer") performance bond, if required, is still valid. Indicate the total amount of the performance bond.
- JFB3-2 Please indicate if TMI has ever collected or is collecting advances, deposits, and/or prepayments from its customers in Arizona. Indicate the outstanding amount of advances, deposits and/or prepayments held by TMI from its customers in Arizona.
- JFB3-3 Please clarify Footnote 1 in your Application and answer Staff's questions. Footnote 1 states "Pioneer provides resold long distance telecommunications services in this State pursuant ... T-0217A-04-0680." What state is "this State"? There is no Docket No. T-0217A-04-0680. Does TMI provide resold long distance service in Arizona? Provide decision number granting TMI authority to provide resold long distance service in Arizona. Provide details of service and number of customers receiving resold long distance service in Arizona.
- JFB3-4 Provide decision number granting TMI authority to provide resold local exchange service in Arizona. Provide details of service and number of customers receiving resold local exchange service in Arizona.
- JFB3-5 Please clarify Footnote 2 in your Application and answer Staff's questions. Footnote 2 states "ATI provides resold local and long distance telecommunications services in this State pursuant ... T-03828A-05-0353." What state is "this State"? Does ATI provide resold local exchange service in Arizona? Provide decision number granting ATI authority to provide resold local exchange service in Arizona. Provide details of service and number of customers receiving resold local exchange service in Arizona. Were ATI's resold local exchange customers transferred to TMI?
- JFB3-6 Provide decision number granting ATI authority to provide resold long distance service in Arizona. Provide details of service and number of customers receiving resold long distance service in Arizona.