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March 23, 2007

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Jonathan S. Marashlian  
Helein & Marashlian, LLC  
1483 Chain Bridge Road  
Suite 301  
McLean, Virginia 22012

RE: Staff's Letter of Insufficiency and First Set of Data Requests to Broadweave Networks of Arizona, LLC  
Docket No. T-20514A-07-0113

Dear Mr. Marashlian:

On February 21, 2007, Broadweave Networks of Arizona, LLC ("BNA") filed an application for a Certificate of Convenience and Necessity ("CC&N") to provide telecommunications services in Arizona. The Application 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 "BNA", "Applicant", "the Company", "you", and "your" refer to Broadweave Networks of Arizona, LLC, any representative, including every person and/or entity acting with, under the control of, or on behalf of to Broadweave Networks of Arizona, LLC. **For each answer, please identify by name, title, e-mail address, telephone number 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. 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).

Please provide Docket Control with the information being requested within **30 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, Staff will recommend that the Application be terminated. 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.

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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) 542-0856. Thank you for your prompt response to this request.

Respectfully,



John F. Bostwick  
Administrative Services Officer II  
Utilities Division

Enclosure(s)

CC: Docket Control (Original and Thirteen Copies)

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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:

JFB1-1. Your tariff indicates that you intend to offer private line service in Arizona. You did not indicate in Item (A-1) of your Application that you intend to offer private line service. Please revise your response to Item (A-1).

JFB1-2. Please be advised that you file your Application on the form dated 04/14/04. You should have used the Application form dated 07/07/06. Make sure your information on the Application is accurate and complete. Provide all information requested on the Application form dated 07/07/06.

JFB1-3. In Item (A-9) you did not provide any reference by Tariff page number to the following information:

1. Proposed Rates and Charges for each service offered (reference by Tariff page number).
2. Tariff Maximum Rate and Prices to be charged (reference by Tariff page number).
3. Terms and Conditions Applicable to provision of Service (reference by Tariff page number).
4. Deposits, Advances, and/or Prepayments Applicable to provision of Service (reference by Tariff page number).
5. The proposed fee that will be charged for returned checks (reference by Tariff page number).

JFB1-4. In Item (A-14) please be advised that a "No" response is not an option. Please check the appropriate box(s).

For Long Distance Resellers, a \$10,000 bond will be recommended for those resellers who collect advances, prepayments or deposits.

Yes

No

If "No", continue to question (A-15).

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For Local Exchange Resellers, a \$25,000 bond will be recommended.

Yes  No

If "No", continue to question (A-15).

For Facilities-Based Providers of Long Distance, a \$100,000 bond will be recommended.

Yes  No

If "No", continue to question (A-15).

For Facilities-Based Providers of Local Exchange, a \$100,000 bond will be recommended.

Yes  No

If any box in (A-14) is marked "No", continue to question (A-15).

Note: Amounts are cumulative if the Applicant is applying for more than one type of service.

JFB1-5. In Item (A-15) if any box in (A-14) is marked "No", provide the following information. You did not reference by tariff page number your deposit policy. Also, you did not provide a detailed explanation or evidentiary data of why the Applicant's financial position is superior and limits any risk to Arizona consumers.

JFB1-6. In Item (B-2), you did not include "Attachment D".

Since you are relying on the financial resources of Gila River Telecommunications, Inc., parent company, please provide the parent company's financial information for the two (2) most recent years.

1. A copy of the Applicant's balance sheet.
2. A copy of the Applicant's income statement.
3. A copy of the Applicant's audit report.
4. A copy of the Applicant's retained earnings balance.
5. A copy of all related notes to the financial statements and information.

Note: Make sure "most recent years" includes current calendar year or current year reporting period.

**Note: Please contact the Legal Division of the Arizona Corporation Commission to make sure your financial statements are treated in a confidential matter. The phone of the Legal Division is 602-542-3402.**

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- JFB1-7. In Arizona Tariff No. 1, you indicated that you want to provide private line services in Arizona. For each type of tariffed service, please answer the set of questions JFB1-8 through JFB1-11.
- JFB1-8. Please explain how your company calculated the actual maximum and actual minimum rates that will be contained in your tariffs for private line services
- JFB1-9. Please indicate why you believe that your range of rates is just and reasonable using a competitive market analysis. Your analysis should contain publicly available examples of tariff rates and charges charged by the incumbent and other carriers for similar services. Include supporting material and any other information that you believe demonstrates that your actual or proposed tariff rates and charges are just and reasonable.

**Use a matrix format to list BNA's proposed services, rates and/or charges.** Based on the Applicant's tariff, list all the private line services BNA will provide in Arizona. For each of the private line services listed, list the rate and/or charge of each service and reference each service, rate and/or charge to BNA's tariff. Provide BNA's tariff pages that support each BNA's services, rates and/or charges.

**Use a matrix format to capture BNA's list of private line services that will be provided in Arizona,** show each competitor's tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to each competitor's tariff. Provide tariff pages of each competitor that support each competitor's services, rates and/or charges offering the same or similar telecommunications services in Arizona.

At a minimum, show a complete set of tariff information of Qwest, Cox Telcom and two other competitors in Arizona. For a list of telecommunications carriers certificated in Arizona, go to [www.cc.state.az.us/utility/utility](http://www.cc.state.az.us/utility/utility). For a list of telecommunications carriers' tariff rates and charges, go to [www.cc.state.az.us/utility/tariffs](http://www.cc.state.az.us/utility/tariffs).

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to other competitors offering the same or similar telecommunications services in Arizona.

- JFB1-10. Please indicate why you believe that your range of rates is just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any supporting materials.

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- JFB1-11. **Use a matrix format to capture BNA's list of private line services that will be provided in Arizona.** Identify other states/jurisdictions in which your company or an affiliate company is providing or applying to provide private line services.

For each private line that will be provided in Arizona, list BNA's or affiliates' rates and/or charges that are or will be charged in other states or jurisdictions. Show for each state or jurisdiction the tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to BNA's or each affiliate's tariff. Provide BNA's or affiliate's tariff pages that support BNA's or each affiliate's services, rates and/or charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

If there is a difference between the tariff rates and charges that BNA or an affiliate charges or will charge in Arizona and the tariff rates and charges that BNA or affiliate charges or will charge in other states or jurisdictions for private line services: please identify the service, indicate the amount of the difference and explain why you are charging different tariff rates and charges in Arizona.

At a minimum, show a complete set of tariff information of Arizona and three other states or jurisdiction.

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to the tariff rates and charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

- JFB1-12. In your Application, you indicated that you want to provide facilities-based local exchange in Arizona. For each type of tariffed service, please answer the set of questions JFB1-13 through JFB1-16.
- JFB1-13. Please explain how your company calculated the actual maximum and actual minimum rates that will be contained in your tariffs for facilities-based local exchange.
- JFB1-14. Please indicate why you believe that your range of rates is just and reasonable using a competitive market analysis. Your analysis should contain publicly available examples of tariff rates and charges charged by the incumbent and other carriers for similar services. Include supporting material and any other information that you believe demonstrates that your actual or proposed tariff rates and charges are just and reasonable.

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**Use a matrix format to list BNA's proposed services, rates and/or charges.** Based on the Applicant's tariff, list all the facilities-based local exchange services BNA will provide in Arizona. For each of the facilities-based local exchange services listed, list the rate and/or charge of each service and reference each service, rate and/or charge to BNA's tariff. Provide BNA's tariff pages that support each BNA's services, rates and/or charges.

**Use a matrix format to capture BNA's list of facilities-based local exchange services that will be provided in Arizona,** show each competitor's tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to each competitor's tariff. Provide tariff pages of each competitor that support each competitor's services, rates and/or charges offering the same or similar telecommunications services in Arizona.

At a minimum, show a complete set of tariff information of Qwest, Cox Telcom and two other competitors in Arizona. For a list of telecommunications carriers certificated in Arizona, go to [www.cc.state.az.us/utility/utility](http://www.cc.state.az.us/utility/utility). For a list of telecommunications carriers' tariff rates and charges, go to [www.cc.state.az.us/utility/tariffs](http://www.cc.state.az.us/utility/tariffs).

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to other competitors offering the same or similar telecommunications services in Arizona.

JFB1-15. Please indicate why you believe that your range of rates is just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any supporting materials.

JFB1-16. **Use a matrix format to capture BNA's list of facilities-based local exchange services that will be provided in Arizona.** Identify other states/jurisdictions in which your company or an affiliate company is providing or applying to provide facilities-based local exchange services.

For each facilities-based local exchange service that will be provided in Arizona, list BNA's or affiliates' rates and/or charges that are or will be charged in other states or jurisdictions. Show for each state or jurisdiction the tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to BNA's or each affiliate's tariff. Provide BNA's or affiliate's tariff pages that support BNA's or each affiliate's services, rates and/or charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

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If there is a difference between the tariff rates and charges that BNA or an affiliate charges or will charge in Arizona and the tariff rates and charges that BNA or affiliate charges or will charge in other states or jurisdictions for facilities-based local exchange services: please identify the service, indicate the amount of the difference and explain why you are charging different tariff rates and charges in Arizona.

At a minimum, show a complete set of tariff information of Arizona and three other states or jurisdiction.

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to the tariff rates and charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

JFB1-17. In your Application, you indicated that you want to provide resold local exchange services in Arizona. For each type of tariffed service, please answer the set of questions JFB1-18 through JFB1-21.

JFB1-18. Please explain how your company calculated the actual maximum and actual minimum rates that will be contained in your tariffs for resold local exchange services.

JFB1-19. Please indicate why you believe that your range of rates is just and reasonable using a competitive market analysis. Your analysis should contain publicly available examples of tariff rates and charges charged by the incumbent and other carriers for similar services. Include supporting material and any other information that you believe demonstrates that your actual or proposed tariff rates and charges are just and reasonable.

**Use a matrix format to list BNA's proposed services, rates and/or charges.** Based on the Applicant's tariff, list all the resold local exchange services BNA will provide in Arizona. For each of the resold local exchange services listed, list the rate and/or charge of each service and reference each service, rate and/or charge to BNA's tariff. Provide BNA's tariff pages that support each BNA's services, rates and/or charges.

**Use a matrix format to capture BNA's list of resold local exchange services that will be provided in Arizona,** show each competitor's tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to each competitor's tariff. Provide tariff pages of each competitor that support each competitor's services, rates and/or charges offering the same or similar telecommunications services in Arizona.

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At a minimum, show a complete set of tariff information of Qwest, Cox Telcom and two other competitors in Arizona. For a list of telecommunications carriers certificated in Arizona, go to [www.cc.state.az.us/utility/utility](http://www.cc.state.az.us/utility/utility). For a list of telecommunications carriers' tariff rates and charges, go to [www.cc.state.az.us/utility/tariffs](http://www.cc.state.az.us/utility/tariffs).

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to other competitors offering the same or similar telecommunications services in Arizona.

JFB1-20. Please indicate why you believe that your range of rates is just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any supporting materials.

JFB1-21. **Use a matrix format to capture BNA's list of resold local exchange services that will be provided in Arizona.** Identify other states/jurisdictions in which your company or an affiliate company is providing or applying to provide resold local exchange services.

For each resold local exchange service that will be provided in Arizona, list BNA's or affiliates' rates and/or charges that are or will be charged in other states or jurisdictions. Show for each state or jurisdiction the tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to BNA's or each affiliate's tariff. Provide BNA's or affiliate's tariff pages that support BNA's or each affiliate's services, rates and/or charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

If there is a difference between the tariff rates and charges that BNA or an affiliate charges or will charge in Arizona and the tariff rates and charges that BNA or affiliate charges or will charge in other states or jurisdictions for resold local exchange services: please identify the service, indicate the amount of the difference and explain why you are charging different tariff rates and charges in Arizona.

At a minimum, show a complete set of tariff information of Arizona and three other states or jurisdiction.

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to the tariff rates and charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

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- JFB1-22. In your Application, you indicated that you want to provide resold interexchange services in Arizona. For each type of tariffed service, please answer the set of questions JFB1-23 through JFB1-26.
- JFB1-23. Please explain how your company calculated the actual maximum and actual minimum rates that will be contained in your tariffs for resold interexchange services.
- JFB1-24. Please indicate why you believe that your range of rates is just and reasonable using a competitive market analysis. Your analysis should contain publicly available examples of tariff rates and charges charged by the incumbent and other carriers for similar services. Include supporting material and any other information that you believe demonstrates that your actual or proposed tariff rates and charges are just and reasonable.

**Use a matrix format to list BNA's proposed services, rates and/or charges.** Based on the Applicant's tariff, list all the resold interexchange services BNA will provide in Arizona. For each of the resold interexchange services listed, list the rate and/or charge of each service and reference each service, rate and/or charge to BNA's tariff. Provide BNA's tariff pages that support each BNA's services, rates and/or charges.

**Use a matrix format to capture BNA's list of resold interexchange services that will be provided in Arizona,** show each competitor's tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to each competitor's tariff. Provide tariff pages of each competitor that support each competitor's services, rates and/or charges offering the same or similar telecommunications services in Arizona.

At a minimum, show a complete set of tariff information of Qwest, Cox Telcom and two other competitors in Arizona. For a list of telecommunications carriers certificated in Arizona, go to [www.cc.state.az.us/utility/utility](http://www.cc.state.az.us/utility/utility). For a list of telecommunications carriers' tariff rates and charges, go to [www.cc.state.az.us/utility/tariffs](http://www.cc.state.az.us/utility/tariffs).

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to other competitors offering the same or similar telecommunications services in Arizona.

- JFB1-25. Please indicate why you believe that your range of rates is just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any supporting materials.

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- JFB1-26. **Use a matrix format to capture BNA's list of resold interexchange services that will be provided in Arizona.** Identify other states/jurisdictions in which your company or an affiliate company is providing or applying to provide resold interexchange services.

For each resold interexchange service that will be provided in Arizona, list BNA's or affiliates' rates and/or charges that are or will be charged in other states or jurisdictions. Show for each state or jurisdiction the tariff rates and/or charges for the same or comparable services and reference each service, rate and/or charge to BNA's or each affiliate's tariff. Provide BNA's or affiliate's tariff pages that support BNA's or each affiliate's services, rates and/or charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

If there is a difference between the tariff rates and charges that BNA or an affiliate charges or will charge in Arizona and the tariff rates and charges that BNA or affiliate charges or will charge in other states or jurisdictions for resold interexchange services: please identify the service, indicate the amount of the difference and explain why you are charging different tariff rates and charges in Arizona.

At a minimum, show a complete set of tariff information of Arizona and three other states or jurisdiction.

The material you provide should enable Staff to determine whether the proposed tariff rates and/or charges of the Applicant are identical or just and reasonable compared to the tariff rates and charges that are or will be charged in other states or jurisdiction offering the same or similar telecommunications services in Arizona.

- JFB1-27. Do you intend to offer switched or special access services to other carriers or providers? If so, have you or do you intend to file an access tariff for these services?
- JFB1-28. Please confirm or deny that your company intends to provide service to both retail end-users and other carriers.
- JFB1-29. Please indicate if you are or will be providing interexchange telecommunications services to retail customers in Arizona.
- JFB1-30. Please indicate if you are or will be providing interexchange telecommunications services to wholesale customers in Arizona.

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JFB1-31. For each type of telecommunications services that you want to provide in Arizona, indicate the Tariff and Section number(s) in the tariff that address resold local exchange, facilities-based local exchange, resold interexchange, and private line services.

JFB1-32. Submit a PDF file of your responses to this data request to [jbostwick@cc.state.az.us](mailto:jbostwick@cc.state.az.us) .