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MEMORANDUM
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TO: Lori Miller
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FROM: John Bostwick
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AZ CORP COMMISSION
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Arizona Corporation Commission
DOCKETED

MAR 26 2007

DATE: March 26, 2007

DOCKETED BY
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RE: DCT Telecom Group, Inc.
Docket No. T-20462A-06-0378 Decision No. 69340

On March 6, 2007, Docket Control received a copy of DCT Telcom Group, Inc.'s ("DCT" or "Company") Arizona Tariff No. 1 bearing an effective date of February 20, 2007. On March 8, 2007, Staff was requested by the Compliance, Enforcement, and Administrative Section of the Utilities Division of the Arizona Corporation Commission ("Commission") to review DCT's tariff for compliance purposes, contact the Company to correct any deficiencies, and recommend, if required, that the Company re-file their tariff through Docket Control.

Staff reviewed the effective date of Decision No. 69340 and the effective date of DCT's tariff to be filed with the Commission. Decision No. 69340 has an effective date of February 20, 2007 and DCT filed its tariff within the required timeframe.

The contents of DCT's proposed tariff are addressed in five Sections consisting of 55 pages. Staff reviewed the five Sections of the tariff but did not review every numbered item in each Section. Staff is not aware of every numbered item in DCT's tariff that agrees or conflicts with every regulation established in the Arizona Administrative Code ("A.A.C.") rules. Also, Staff is unable to verify that every regulation in each Section of the Articles related to telecommunications in the A.A.C. rules is captured in DCT's proposed tariff.

Staff is aware that DCT has deficiencies in its proposed tariff that need to be corrected for compliance purposes. QCC's tariff lacks accurate information regarding definition(s), billing and collection, and termination of service.

Definition(s)

The following lists each technical term or abbreviation in DCT's tariff and the A.A.C. rule number that defines the technical term or abbreviation approved by the Commission:

<u>Term or Abbreviation</u>	<u>A.A.C. Rule Number</u>
Customer	R14-2-501 item number 9
LATA	R14-2-1001 item number 13
LEC	R14-2-1001 item number 14

Rate Center
Tariff

R14-2-1302 item number 19
R14-2-501 item number 20

Staff recommends that DCT use the same definition for each term or abbreviation as those listed by the corresponding A.A.C. rule number. This will help to ensure each term or abbreviation approved by the Commission is used in DCT's tariff.

Billing and Collection

Staff was not able to locate billing and collection procedures in DCT's tariff. According to A.A.C. R14-2-508, Billing and Collection, more specifically R14-2-508 C., entitled "Billing terms", each utility shall file a tariff which incorporates certain billing procedures. The billing procedures are numbered 1 through 4 within this Section of the Commission rules.

Staff recommends that DCT revise its tariff to include these billing terms and procedures. This will help to ensure that all customers in Arizona are treated with fair and consistent billing terms and procedures.

Termination of Service

Under A.A.C. R14-2-509 D., items 1 and 2, there are termination notice requirements to provide advance written notice to the customer and the written notice must contain minimum information. Staff was unable to locate termination notice requirements in DCT's tariff.

Staff recommends that DCT revise its tariff to include the termination notice requirements in R14-2-509 D., items 1 and 2. This will help to ensure that all Arizona customers being terminated by the Company are properly informed.

According to A.A.C. R-14-2-509 E., items 1 through 6, there are requirements that address the timing of terminations with notice. Staff was unable to locate requirements that addressed the timing of terminations with notice in DCT's tariff.

Staff recommends that DCT revise its tariff to include the timing of terminations with notice requirements in R14-2-509 E., items 1 through 6. This will help to ensure that all Arizona customers being terminated by the Company are informed in a timely manner.

Recommendation(s)

Staff forwarded an electronic copy and a docketed copy of this memorandum to Ms. Beth Ronfeldt, Legal Assistant, to Mr. Patrick D. Crocker, Legal Representative for DCT, to inform him of the revisions that need to be made to DCT's tariff. Staff recommends that DCT adopt Staff's recommended tariff changes, revise its tariff and file its revised tariff (Original and thirteen (13) copies) with Docket Control as a tariff compliance item at the Commission. Any questions regarding Staff's recommended revisions to this tariff may be directed to me at (602)-542-0856.