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AZ CORP COMMISSION
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November 9, 2007

Via UPS

Docket Control Center
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007-2927
602.542.3477

Re: Tower Cloud, Inc.'s Response to Staff's Letter of Insufficiency and First Set of Data Requests

Docket Number: T-20563A-07-0627

Dear Sir or Madam:

Please find enclosed one (1) original and thirteen (13) copies of the referenced response. Kindly contact me if you require any additional information regarding the application.

Regards,

Kim Swartz, ACP
Contractor
Tower Cloud, Inc.
727.471.5691
kswartz@towercloud.com

Arizona Corporation Commission
DOCKETED

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9501 International Court N.
St. Petersburg, Florida 33716
(727) 471-5600

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**Tower Cloud, Inc. Response to Arizona Corporation Commission
 Staff's First Set of Data Requests to
 Tower Cloud, Inc. ("TCI")
 Docket T-2563A-07-0627**

STF 1.1	Searchable copy of tariff via email to afimbres@azcc.gov	Sent by Kim Swartz 11/9/07
STF 1.2	Attachment D in excel file format via email to afimbres@azcc.gov	Sent by Kim Swartz 11/9/07
STF 1.3	Attachment B-4 in excel file format via email to afimbres@azcc.gov	Sent by Kim Swartz 11/9/07
STF 1.4	Provide Requested in A-8.3 of the CC&N	Attached
STF 1.5	Confirm or correct TCI deposit and prepayment policy is stated in tariff section 2.4	TCI confirms its deposit and pre-payment policy as stated in tariff section 2.4. It should be noted that as of this date, TCI has not required pre-payment or deposit from any customer.
STF 1.6	Does TCI understand that rates in tariff will be considered Maximum Rates	TCI understands that the rates specified in the Tariff are Maximum Rates.
STF 1.7	Discuss how TCI rates compare to those of key competitors	Rates charged by TCI and its competitors are confidential proprietary information. Therefore, TCI does not know what its competitors charge for similar services. TCI and its competitors have been involved in many RFPs for the same customers. Some contracts have been awarded to TCI and some to its key competitors. Therefore, TCI believes its rates are probably comparable to those of its key competitors.
STF 1.8	Clarify meaning of tariff section 2.4.3. Under what conditions might TCI ask for a deposit or prepayment amount less than two and one-half months' estimated charges?	Section 2.4.3 means the deposit or pre-payment amount is a not to exceed number. TCI can, based on its assessment of its customer, charge anywhere from 0 up to a maximum of two and one-half months estimated charges. Perhaps TCI would charge less than two and on-half months' estimated charges to a customer that, while not high risk, was on the borderline of no risk and somewhat risk.
STF 1.9	Clarify 2.4.7 in a similar manner as 2.4.3	Section 2.4.7 was meant to indicate that both a pre-payment and deposit may be required. The same clarification from 2.4.3 applies to 2.4.7. It should be noted that as of this date, TCI has not required pre-payment or deposit from any customer.
STF 1.10	Explain why 2.10.4 does not explicitly refer to	Section 2.10.4 does not explicitly refer to the returned check charge of \$25

	the returned check charge of \$25 in tariff section 4.1.6	because section 2 addresses the rules and regulations that apply while section 4 provides the specific rates and charges that apply to the rules and regulations.
STF 1.11	If tariff section 2.10.4 should not be interpreted to refer to the \$25 charge in section 4.1.6, please clarify the "non-recurring charge" referenced in section 2.10.4	Section 2.10.4 should be interpreted to refer to the \$25 referenced in section 4.1.6.
STF 1.12	Has TCI been denied authority to offer telecommunications services in any state jurisdictions?	TCI has not been denied authority to offer telecommunications services in any state jurisdictions.
STF 1.13	Explain when TCI began providing telecommunication services in FL, NC and OR and TCI customer complaint history in those states	<ol style="list-style-type: none"> 1) TCI began providing telecommunication services in Florida in June 2007. TCI currently only provides telecommunication services in Florida despite its having authorization in North Carolina and Oregon. 2) TCI has had no customer complaints in Florida.

Attachment A
A-8.2
A-8.3

Percentage of Ownership	Tower Cloud, Inc. Corporate Officers	9/24/2007
	Ronald J. Mudy President and CEO	9.54
	Thomas W. Guard CFO	1.2
	Jonathan E. Yount SVP, Network Services	0
	Richard A. Saffir General Counsel	7.05
	Melissa J. Buda VP, Legal and Regulatory Corporate Secretary	1.08
	George N. Townsend VP, Business Development	0.05
	John Verghese VP, Network Planning and Engineering	0.05
	Patricia T. Morrison VP, Finance	1.08
	Directors	
	Ronald J. Mudy	9.54
	Scott Irwin	0
	Tench Coxé	0.97
	Joseph Stockwell	8.04
	David Grain	0