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ARIZONA CORPORATION COMMISSION

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December 12, 2007

Arizona Corporation Commission

DOCKETED

AZ CORP COMMISSION

James Rapacciolini
Sterling Payphones LLC
200 Public Square #700
Cleveland, Ohio 44114

DEC 12 2007

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RE: Staff's Letter of Insufficiency and First Set of Data Requests to Sterling Payphones LLC
Docket No. T-20558A-07-0611

Dear Mr. Rapacciolini:

On October 19, 2007, Sterling Payphones LLC ("Sterling") filed an application for a Certificate of Convenience and Necessity ("CC&N") to provide customer owned pay telephone ("COPT") 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 "Sterling", "Applicant", "the Company", "you", and "your" refer to Sterling Payphones LLC, any representative, including every person and/or entity acting with, under the control of, or on behalf of Sterling Payphones 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).

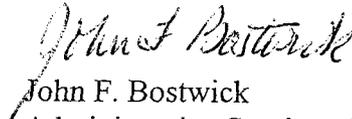
Please provide Docket Control with the information being requested within **10 days** of the date of this letter. Mail an Original plus 13 copies to Docket Control, Arizona Corporation Commission, 1200 W. Washington Street, Phoenix, AZ 85007-2927. If no response is received, Staff will recommend that 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.

December 12, 2007

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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)

STAFF'S FIRST SET OF DATA REQUESTS TO
STERLING PAYPHONES LLC
DOCKET NO. T-20558A-07-0611

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. Please provide a copy of your customer information placard for customer owned pay telephone ("COPT"). Enclosed on Page 3 is copy of the regulations pertaining to the COPT placard. Make sure your placard has all the information requested in item numbers 1 through 5 and 6a through 6g on Pages 3 and 4.
- JFB1-2. Please use the above reference numbers and letters (1 through 5 and 6a through 6g) to label each regulatory item listed on your COPT placard. This will help ensure that each required item is listed on your COPT placard. In turn, this will help expedite processing of your Application to provide COPT service in Arizona.
- JFB1-3. Please describe any affiliated relationship with other Public Service Corporations or Telecommunications Companies operating in Arizona.
- JFB1-4. Please provide the addresses and descriptions of locations to be served in Arizona and include the name of the serving LEC.
- JFB1-5. Please provide a description of the equipment being used, or intended to be used, to provide service.
- JFB1-6. Please provide a list of services provided or to be provided and the proposed rates.
- JFB1-7. Please provide an example of the contract between the customer of record and the premises owner, if different.
- JFB1-8. Please describe how information posting and complaint handling requirements will be met.
- JFB1-9. If the Applicant is planning to serve more than 50 locations, please submit relevant financial data, including current financial statements, the method of financing operations, and projected annual operating expenses. Please note that the number of services locations shall include all those of the customer of record and affiliates.

STAFF'S FIRST SET OF DATA REQUESTS TO
STERLING PAYPHONES LLC
DOCKET NO. T-20558A-07-0611

- JFB1-10. Please provide documentation that you have registered your Company name with the Corporation Division of the Arizona Corporation Commission.
- JFB1-11. Please provide a copy of the APPLICATION FOR REGISTRATION OF TRADE NAME document stamped and dated from the Arizona Secretary of State office.
- JFB 1-12 Refer to COPT Placard information and regulations on Pages 3 and 4. Provide a copy of your COPT placard with labels of the reference numbers and letters in Item No. 6 a. through g. of each regulatory item.

(NOTE: Please use the reference numbers and letters below to label each regulatory item listed on your COPT placard. This will help ensure each required item is captured on your COPT placard. In turn, this will help expedite processing your application to provide COPT service in Arizona.)

***COPT providers do not have to provide long distance telephone service. If the provider does provide long distance telephone service, then 6.g. applies.**

STAFF'S FIRST SET OF DATA REQUESTS TO
STERLING PAYPHONES LLC
DOCKET NO. T-20558A-07-0611

CUSTOMER OWNED PAY TELEPHONE (COPT) PROVIDERS
COPT PLACARD MUST COMPLY WITH THE FOLLOWING REGULATIONS:

1. COPT instruments will be placed in well-lighted locations and will be maintained in good working order. The COPT provider will respond promptly to reports of equipment failure and other reasonable complaints. The COPT provider's name and telephone number of the COPT will be displayed prominently on each COPT instrument.
2. Instructions on how to make a call, how to report malfunctions, and how to obtain refunds, will be posted at every COPT location in those languages required by the Commission.
3. Services limitations (e.g., local calling only, outgoing calls only) will be clearly posted at each COPT location. If service is limited to local calling, access to local operators will be provided.
4. Access to Local Directory Assistance may be provided free of charge and without the use of a coin. Charges for Directory Assistance will be clearly posted at each COPT location.
5. Time limits on local calls without additional coins will not be less than three (3) minutes. Time limitations will be clearly posted.
6. The COPT operator service provider will post all of the following information, on or near the COPT, in plain view of the end-user:
 - a. The name, address, and toll-free telephone number of the COPT provider;
 - b. A written disclosure that the rates, operator service charges and location specific surcharges of the COPT operator service provider apply for all operator-assisted calls;
 - c. A statement that interLATA calls made with calling cards, including IXC cards, may be carried by the COPT service provider;
 - d. Dialing instructions;
 - e. A toll-free telephone number for billing inquiries;
 - f. A description of complaint procedures; and
 - g. End-users have a right to obtain access to the interexchange carrier of their choice.*