

**LEWIS  
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ROCA**  
LLP  
LAWYERS  
**ORIGINAL**

Michael T. Hallam  
40 North Central Avenue  
Phoenix, Arizona 85004-4429



0000081661

Direct Fax: (602) 734-3886  
MHallam@LRLaw.com  
Admitted in: Arizona

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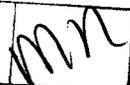
February 11, 2008

ADMITTED TO PRACTICE  
DOCKET CONTROL

Arizona Corporation Commission  
**DOCKETED**

FEB 11 2008

Docket Control  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007-2996

DOCKETED BY 

Re: **Docket No. T-03517A-07-0633 and T-20522A-07-0633; Response of  
Americatel Corporation and Startec Global Operating Company to Staff's  
First Set of Data Requests**

Docket Control:

Americatel Corporation ("Americatel") and Startec Global Operating Company ("Startec") (collectively, "Applicants") hereby provide the below information in response to Staff's First Set of Data Requests in the above-referenced proceedings.

Sincerely,

Michael T. Hallam

MTH/jw  
Enclosure

cc: John Bostwick

**JFB1-1 Confirm that Startec does not have a performance bond on file with the Commission.**

Startec does not currently have a performance bond on file with the Commission.

**JFB1-2 Confirm that Startec does not and has never has collected advances, deposits, and/or prepayments from its customer.**

Startec currently does not and has never collected advances, deposits, or prepayments from its Arizona customers.

**JFB1-3 Indicate the number of customers Americatel will have when Startec customers are transferred from Startec to Americatel.**

The companies deem these customer counts to be proprietary and confidential and would request that they be allowed to provide these confidentially to Staff and that the customer numbers not appear in the public docket.

**JFB1-4 How many of Startec' s customers have been transferred to Americatel as of this date? What is the date the last Startec customer has been or will be transferred to Americatel? How many of Startec' customers have been or will be transferred to telecommunications carriers other than Americatel? Please indicate the date and number of Startec's customers that were transferred to telecommunications carriers other than Americatel. Indicate the name of the telecommunications carriers the customers were transferred to and the number of customers transferred. Indicate the date that Startec has stopped or will stop providing service to its customers?**

No Startec customers have been transferred to Americatel as of the date of this filing. Customers will be transferred to Americatel effective upon the date of the proposed merger, on or about March 31, 2008.

Between the dates of November 6, 2007—the date Startec customers were notified of the proposed merger—and the date of this response, 352 Startec presubscribed long distance customers have cancelled service. Each of these customer's local exchange providers is responsible for arranging any requested transfer to an alternative preferred long distance carrier. As a result, Applicants are unable to determine whether the Startec customers that have cancelled service have selected an alternative telecommunications carrier or the date any such transfer may have occurred.

Startec will stop providing service to its customers upon consummation of the proposed merger, on or about March 31, 2008. At that time, Americatel will begin providing service to all remaining Startec customers.

**JFB1-5      Indicate the number of Startec customers that had a contract with Startec and were transferred to Americatel and/or other carriers.**

Startec does not have individual contracts with any of its customers in Arizona. Startec posts its terms and conditions on its website. Subscribers may terminate service at any time without penalty.

**JFB1-6      Did Startec make an indirect charge, restrict, and/or penalize its customers whose services were transferred to telecommunications carriers other than Americatel? If so, indicate the amount of the indirect charge and the number of Arizona customers impacted by the indirect charge for the transfer.**

Startec does not charge any cancellation fees in Arizona. Specifically, Startec has not and will not charge, restrict or penalize any customers whose services were or will be transferred to telecommunications carriers other than Americatel. Rather, any customer that opts to transfer to a carrier other than Americatel will only be charged his or her fixed monthly service charges, if any, on a prorated basis as of the date service was cancelled.

**JFB1-7      Confirm that Startec customers were notified of Startec's discontinuance of certificated service and transfer its customer base to Americatel on November 6, 2007. Please provide a copy of any other notification letter(s) sent to the affected customers.**

Startec and Americatel notified all affected Startec subscribers in Arizona of the proposed merger on November 6, 2007 by U.S. first-class mail in both English and Spanish. Applicants have already provided a copy of these notifications to the Commission as part of the Application; no additional notification letters have been sent to affected subscribers in Arizona.

**JFB1-8      Indicate if or when a list of alternative utilities (carriers) was given to Startec's customers whose certificated services were being discontinued and/or customers were being transferred to another carrier. If a list of alternative carriers was not provided or will not be provided, please explain why.**

The Applicants did not list alternative providers because this is not a situation in which service will be discontinued as is typically the case under R14-2-1107. Rather, Americatel will continue to provide service to the customers after the merger. Startec and Americatel did notify customers that they have the right to select another long distance provider at any time.

**JFB1-9      How many of Startec's customers have not selected a resold interexchange service provider as of the date of your reply to this data request?**

See response to JFB 1-3 with regard to the number of Startec's remaining presubscribed interexchange customers (i.e., the customers that have not selected another provider). This question is inapplicable to Startec's dial around customers because these customers have not selected Startec as their presubscribed interexchange carrier.

**JFB1-10     Provide proof that either Startec or Americatel has met the requirements of the Federal Communications Commission's ("FCC") rules for streamlined approval of the transfer of customer base. Documentation sent to the FCC and the advance subscriber notice containing seven required elements should be provided as proof of compliance to FCC's rules.**

The FCC rules require that Americatel certify to the FCC that it has provided at least 30 days' written notice to each subscriber affected by this transaction "no later than 30 days before the planned transfer of the affected subscribers," 47 C.F.R. § 64.1120(e)(1-3). The proposed transaction is scheduled to occur on or about March 31, 2008; thus, the self-certification letter is due at the FCC no later than March 1, 2008. The Applicants are in the process of distributing the required customer notices. As a result, Americatel has not yet filed the self-certification letter that the FCC requires 30 days' in advance of the transaction. Applicants will provide the Commission a copy of that self-certification letter upon filing it with the FCC.

**JFB1-11     Startec has a "Compliance Due" item pending before the Commission in Docket No. T-020522A-07-0161.**

The required tariff was re-filed on January 31, 2008. Based on discussions with Commission Staff, the tariff was filed within Docket No. T-20522A-07-0161 rather than as a new application.

**JFB1-12     Identify the tariff that will be used to bill Startec customers when Startec customers are transferred to Americatel. Also, explain what Americatel means by "...Americatel will assume the customers and operations of Startec but will continue to use the Startec brand name for those customers, possibly on a co-branded basis."**

Americatel seeks consent to adopt the portion of the Startec tariff that contains the rates for the Carrier Identification Codes ("CICs") used by existing Startec customers. After the proposed merger, Americatel will bill Startec customers pursuant to that adopted tariff. The Startec tariff will not be grandfathered to existing customers, so that any new customers (or

Americatel customers) will be able to elect to use the current Startec CICs at the current tariffed rate. In addition, the current Americatel tariff will retain the rates for the existing Americatel CICs. Different rates are used for each CIC because each code is tailored to a specific market (e.g., one code is tailored to customers calling Latin America). The structure of the service is the same (each code has a connection fee and a per-minute fee), but the rates are different for each depending on which code is used.

After the proposed merger, Startec will cease to exist as a separate corporate entity; accordingly, Americatel will assume the existing customers and operations of Startec. Americatel intends to continue serving the exiting Startec customers under the "Startec" name, and will register the name "Americatel Corporation d/b/a Startec" with the Arizona Secretary of State.

**JFB1-13      Americatel has two "Compliance Due" items pending before the Commission in Docket Nos. T-03517A-06-0586 and T-03517A-98-0089. Please contact the Compliance and Enforcement Section of the Utilities Division of the Arizona Corporation Commission to determine the items and/or issues that need to be addressed or completed to close Docket Nos. T-03517A-06-0586 and T-03517A-98-0089. Closure of these items will help to expedite this Application and help to ensure Commission approval of your request.**

Americatel does not believe that there are any outstanding compliance items on these matters, but is still working to confirm this with the Compliance and Enforcement Section.