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CERTIFIED MAIL

Mr. Michael Patten
Roshka, DeWulf, and Patten, P.L.C
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004

DOCKETED BY 

RE: **COMPLIANCE-First Communications, LLC**
Docket No. T-20473A-06-0537 Decision No. 69419

Dear Mr. Patten:

On May 6, 2008, First Communications, LLC ("First" or "Company") filed, with Docket Control a copy of its Arizona Tariff No. 1. First filed its tariff in compliance with Decision No. 69419.

Staff is aware that First has deficiencies in its proposed tariff that need to be corrected for compliance purposes. First's tariff lacks accurate information regarding Billing and Collection.

Billing and Collection

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 First 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.

Recommendation(s)

Staff recommends that First 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)-364-0235.

Respectfully,



Candrea Allen
Executive Consultant I
Utilities Division