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Ms. Cherie Kiser  
Cahill Gordon & Reindel LLP  
1990 K Street, N.W.  
Washington, D.C. 20006

RE: Staff's Letter of Insufficiency and Third Set of Data Requests to STi Prepaid, LLC and Dialaround Enterprises Inc.  
Docket Nos. T-20517A-07-0135 and T-04045A-07-0135

Dear Ms. Kiser:

On March 2, 2007, STi Prepaid, LLC ("STi") and Dialaround Enterprises Inc. ("DEI") (together "Applicant") filed an application for approval of a transfer of assets and Certificate of Convenience and Necessity ("CC&N") to provide intrastate telecommunications services and approval of termination of service by DEI in Arizona. The Application submitted is not sufficient. This data request lists the information Staff needs to complete its Staff Report.

For purposes of this data request set, the word "STi" refers to STi Prepaid, LLC, any representative, including every person and/or entity acting with, under the control of, or on behalf of STi Prepaid, LLC. Also, the word "DEI" refers to Dialaround Enterprises Inc., any representative, including every person and/or entity acting with, under the control of, or on behalf of Dialaround Enterprises Inc. **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 lack information it believes is needed to complete its Staff Report. If Staff is unable to complete its Report, Staff will note this as a substantial amendment to the filing or an extraordinary event and request an extension of time to obtain information needed to complete its Staff Report.

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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 Fifteen Copies)

STAFF'S THIRD SET OF DATA REQUESTS TO  
STi PREPAID, LLC AND DIALAROUND ENTERPRISES INC.  
DOCKET NOS. T-20517A-07-0135 and T-04045A-07-0135

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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 complete its Staff Report, the following information must be submitted:

- JFB3-1. Please provide a copy of the legal notice of the Application to cancel telecommunications services in all counties affected by the Application. Counties affected are those counties where DEI is certificated to provide telecommunications services. Refer to Arizona Administrative Code ("A.A.C.") rule R14-2-1107.
- JFB3-2. Please provide on a monthly basis the average number of customers served by DEI in Arizona. If available, please provide on a monthly basis the average number of residential customers served by DEI in Arizona. If available, please provide on a monthly basis the average number of business customers served by DEI in Arizona.
- JFB3-3. Please indicate if there are any affiliates of DEI currently offering telecommunications services in Arizona. If yes, are the telecommunications services provided by DEI similar to those offered by the Applicant's affiliates?
- JFB3-4. Please indicate the state(s) DEI currently operates in to provide telecommunications services to customers in Arizona.
- JFB3-5. Does DEI have any employees in Arizona? If so, please list the number of employees by type of category (i.e. management, technical, and customer service).
- JFB3-6. Please have DEI provide proof that it met the requirement of the Federal Communications Commission's ("FCC") rules for streamlined approval of the transfer of the customer base. Provide a copy of DEI's FCC Public Notice Streamlined Pleading Cycle Released