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ORIGINAL

AZ CORP COMMISSION  
DOCKET CONTROL

May 27, 2010

Arizona Corporation Commission  
Attn: Docket Control  
1200 West Washington Street, Room 108  
Phoenix, AZ 85007

Re: Docket No. T-0420<sup>2</sup>A-10-0174

Dear Sir/Madam:

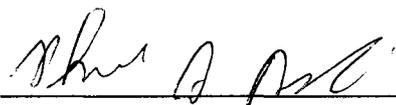
Please find enclosed for filing an original and 13 copies of Syniverse Network, Inc.'s Amended Request to Surrender its Certificate of Convenience and Necessity for filing in the above referenced docket.

I am enclosing an additional 14<sup>th</sup> copy of the filing, along with a self addressed stamped envelope, and would ask that you return a file-stamped copy of the filing.

Please let me know if you have any questions or need any additional information.

Sincerely yours,

WILKINSON BARKER KNAUER, LLP

By:   
Philip J. Roselli

Arizona Corporation Commission  
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May 27, 2010

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Steven M. Olea, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington St.  
Phoenix, AZ 85007

2010 MAY 28 A 10: 58

AZ CORP COMMISSION  
DOCKET CONTROL

*Re: Docket No. T-04202A-10-0174: Syniverse Networks, Inc. d/b/a Syniverse Technologies, Inc., Amended Request to Surrender its Certificate of Convenience and Necessity (Granted in Docket No. T-04202A-04-0362)*

Dear Mr. Olea:

This filing amends the prior submission in this docket, dated May 4, 2010, whereby Syniverse Networks, Inc. d/b/a Syniverse Technologies, Inc. ("Syniverse") petitioned to surrender its Certificate of Convenience and Necessity ("Certificate") to provide resold local exchange telecommunications services as a switchless reseller. The Certificate was granted to Syniverse by the Commission on December 18, 2003, in Decision No. 66638.<sup>1</sup> This firm represents Syniverse and has been authorized to make this letter filing. With this application, Syniverse also requests cancellation of all tariffs it has on file with the Commission. This amended filing corrects a misstatement regarding Syniverse's provision of services pursuant to its Arizona Certificate. Specifically, this amended filing clarifies that Syniverse has not provided any services under its Arizona Certificate from July 2008 to the present date, and that, accordingly, Syniverse currently serves no customers pursuant to its Arizona Certificate.

Syniverse's request to surrender its Certificate is based on Syniverse's business decision that it no longer intends to offer resold local exchange telecommunications services in the State of Arizona. Syniverse does not currently provide resold telecommunications service to any customer in Arizona, and Syniverse has never collected advances, deposits, or prepayments from any customer in Arizona. As a result, Syniverse's surrender of its Certificate and the cancellation of its tariff will not affect any customer. Syniverse therefore respectfully requests that the Commission waive the notice, refund and other abandonment requirements of Arizona Administrative Code R14-2-1107(A)(2)-(4) and (B).<sup>2</sup>

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<sup>1</sup> The Certificate was originally granted to TSI Telecommunication Network Services, Inc. ("TSI"). On May 12, 2004, in Docket No. T-04202A-04-0362 ("Name Change Docket"), TSI filed a Notice of Corporate Name Change, to Syniverse Networks, Inc. On July 12, 2004, Commission Staff filed a letter in the Name Change Docket indicating that the tariffs reflecting the change of TSI's name to Syniverse became effective by operation of law on June 9, 2004, and directed Docket Control to administratively close the docket. On July 20, 2004, the Commission's Docket Control Division administratively closed Docket No. T-04202A-04-0362

<sup>2</sup> See, e.g., A.C.C. Decision No. 70948, at 3 (2009) ("A.A.C. R14-2-1107(A)(2) and (4) and (B) do not apply to GTC as to its CC&N to provide competitive resold local exchange telecommunications services

In order to expedite the abandonment process, Syniverse submits the following, additional information to the Commission regarding the abandonment of its Certificate and the cancellation of its tariff(s):

- Pursuant to Decision No. 68068 in Docket No. T-04202A-03-0612, the Commission waived the requirement that Syniverse obtain a \$25,000 performance bond as a condition of operation. Thus, Syniverse does not have a currently effective performance bond in Arizona.
- Based on its request for a waiver of A.A.C. R14-2-1107(A)(2)-(4) and (B) in this application, Syniverse has not provided any legal notices of this cancellation to any counties or customers. Syniverse has no customers of resold local exchange services in Arizona, and thus there is no one to notify regarding the surrender of its Certificate. Moreover, no customers have been transferred to other telecommunications carriers and there is no reasonable basis for Syniverse to have a plan in place for the refund of customer deposits.
- There are no Syniverse affiliates that are currently offering telecommunications services in Arizona.
- Syniverse does not have any employees in Arizona, including management, technical, or customer service personnel.
- Syniverse has no facilities located in Arizona.
- Syniverse has not provided service pursuant to its Arizona Certificate since July 2008.

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because GTC has never provided resold local exchange telecommunications services in Arizona.”); A.C.C. Decision No. 70163, ¶ 14 (waiving the notice requirements of A.A.C. R14-2-1107 where a reseller of telecommunications services “had no customers to notify of the [abandonment] Application, of the cessation of business in Arizona, or to whom to provide a list of alternative providers.”).

Docket No. T-04202A-10-0174  
Syniverse Technology Inc.’s Amended Request to Surrender  
its Certificate of Convenience and Necessity

Should any further information be required prior to cancellation of the Certificate and the tariff, please do not hesitate to contact me at the address below.

Sincerely,



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