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July 9, 2010  
Via Overnight Delivery

**ORIGINAL**

Pamela Genung, Public Utilities Analyst – Utilities Division  
Arizona Corporation Commission  
1200 W. Washington Street  
Phoenix, Arizona 85007-2927

RE: Response to Staff's First Set of Data Requests to **Global Crossing Telemanagement, Inc. and Global Crossing Local Services, Inc.**  
Docket Nos. T-03539A-10-0240 and T-03658A-10-0240

Dear Sir/Madame:

Enclosed for filing please find the original and thirteen (13) copies of the Response to Staff's First Set of Data Requests submitted on behalf of Global Crossing Telemanagement, Inc. and Global Crossing Local Services, Inc. This filing is submitted in connection with the above referenced docket numbers.

Please acknowledge receipt of this filing by returning, file-stamped, the extra copy of this cover letter in the self-addressed, stamped envelope enclosed for this purpose.

Any questions you may have pertaining to this filing should be directed to my attention at (407) 740-3004 or [rnorton@tminc.com](mailto:rnorton@tminc.com).

Sincerely,

Robin Norton,  
Consultant to Global Crossing

RN/lm

cc: R. Edward Price - Global Crossing  
file: Global Crossing Local Services, Inc. - AZ  
Global Crossing Telemanagement, Inc. - AZ  
tms: AZL1001a

Arizona Corporation Commission  
**DOCKETED**

JUL 15 2010

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RESPONSE TO

STAFF'S FIRST SET OF DATA REQUESTS TO GLOBAL CROSSING  
TELEMANAGEMENT, INC. AND GLOBAL CROSSING LOCAL SERVICES, INC.  
DOCKET NOS. T-03539A-10-0240 AND T-03658A-10-0240

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**PJG1-1** Since customers are being transferred from GCTM to GCLS and a customer notification will be sent out to those affected customers, GCTM and GCLS should request a waiver to the requirements of Arizona Administrative Code ("A.A.C.") R14-2-1904 et seq., the Commission's Slamming rules (Article 19 – Consumer Protections For Unauthorized Carrier Changes).

**Response:** GCTM and GCLS hereby request a waiver of A.A.C R14-2-1904 et seq.

**PJG1-2** Pursuant to A.C.C. R14-2-1107(B) please provide an affidavit confirming publication of legal notice in all counties affected by the Application.

**Response:** Publication is scheduled for July 9, 2010. The affidavit will be forwarded upon receipt.

**PJG1-3** Please identify and explain whether GCLS has any outstanding or unresolved consumer complaints, relevant proceedings, or issues in any of the other states in which it is providing service.

**Response:** To the best of GCLS's knowledge, there are no outstanding or unresolved complaints, proceedings or issues in any state.

**PJG1-4** Please identify and explain whether GCLS or any of its Arizona subsidiaries has any outstanding or unresolved consumer complaints with this Commission.

**Response:** To the best of GCLS' knowledge, there are no outstanding or unresolved complaints, proceedings or issues in Arizona for GCLS or any affiliated company

**PJG1-5** Please verify whether GCLS is in compliance with Commission decisions, rules and regulations and filing of annual reports.

**Response:** To the best of GCLS' knowledge, it is in compliance with all Arizona decisions, rules and reporting requirements including the filing of annual reports.

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**PJG1-6** Please identify where the call center(s) or service center(s) are located for customers of GCTM and GCLS.

**Response:** Most customers of both companies have individual account executives who handle all inquiries and other customer needs. The same toll free telephone number is also available for customers of both companies for inquiries, complaints and repair. There is also a network operations center located at 14605 South 50<sup>th</sup> Street, Phoenix, AZ 85044.

**PJG1-7** If call center(s) or service center(s) are located in Arizona, as identified in PJG1-6, please identify the number of employees at each center

**Response:** There are 227 employees at the Phoenix location identified above.

**PJG1-8** Please indicate whether GCLS foresees any Arizona workforce layoffs of employees from GCTM, GCLS, or any of GCLS' subsidiaries should this Application be approved by the Commission

**Response:** Approval of this Application will allow the approximately six GCTM customers to be served by GCLS, and there will be no layoffs as a result.

**PJG1-9** Please indicate whether GCLS foresees any Arizona plant or facility closings from GCTM, GCLS, or any of GCLS' subsidiaries should this Application be approved by the Commission

**Response:** No Arizona plant or facility closings are contemplated as a result of the planned merger.

**PJG1-10** Please indicate what effect the merger will have on GCLS' overall investment in Arizona

**Response:** The merger will result in eventual cost savings relating to regulatory compliance and taxes, but there is no contemplated impact on overall investment

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**PJG1-11** Please identify any changes in the debt situation of GCLS as a result of this transaction should this Application be approved by the Commission.

**Response:** There will be no changes in the debt structure of GCLS as a result of the planned merger. Following the completion of the merger, GCTM will no longer exist.

**PJG1-12** Please identify all Arizona affiliates of GCLS.

**Response:** Global Crossing Telemanagement, Inc.  
Global Crossing North American Networks, Inc.  
Global Crossing Telecommunications, Inc.