

ORIGINAL  
MILLER  
ISAR INC.  
TRUSTED ADVISORS



0000115871

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GIG HARBOR, WA 98335  
TELEPHONE: 253.851.6700  
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ANDREW O. ISAR

Via Overnight Delivery

August 23, 2010

Docket Control Center  
Arizona Corporation Commission  
1200 W. Washington Street, Room 108  
Phoenix, Arizona 85007-2996

Arizona Corporation Commission

DOCKETED

AUG 24 2010

DOCKETED BY	
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Re: Staff's Second Set of Data Requests to Central Telecom Long Distance, Inc.,  
Docket No. T-20740A-10-0205

Dear Sir/Madam:

Pursuant to Staff's August 12, 2010 electronic Second Set of Data Requests in the above-referenced matter, Central Telecom Long Distance, Inc. ("CTLTD" or the "Company"), by its regulatory consultants, hereby responds. An original and thirteen (13) copies of this letter and attachments are enclosed.

Please acknowledge receipt of this filing by file-stamping and returning the additional copy of this Application and transmittal letter in the self-addressed, postage-paid envelope provided for this purpose. Questions may be directed to the undersigned.

Sincerely,

MILLER ISAR, INC.

Andrew O. Isar

Enclosures

Regulatory Consultants to  
Central Telecom Long Distance, Inc.

cc: Ms. L. Morrison via electronic delivery (LMorrison@azcc.gov)

ARIZONA CORPORATION COMMISSION  
DOCKET CONTROL

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RECEIVED

STAFF'S SECOND SET OF DATA REQUESTS TO  
CENTRAL TELECOM LONG DISTANCE, INC.  
DOCKET NO. T-20740A-10-0205  
AUGUST 12, 2010

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Each of the following responses was prepared by:

Andrew O. Isar,  
Miller Isar, Inc.  
4423 Point Fosdick Drive, NW  
Gig Harbor, Washington 98335  
Telephone: 253.851.6700

Regulatory Consultants to  
Central Telecom Long Distance, Inc.

STF 2.1      The Company's response to STF 1.2(a) is slightly different from its response to Section A-18 of the application. Specifically, the response to STF 1.2(a) does NOT contain Florida and adds Idaho and Missouri. Please clarify if Florida is a state in which the Company is authorized to provide telecommunications services similar to those it is proposing to offer in Arizona.

**Response:**      Applicant is authorized to provide telecommunications services in Florida. Florida was inadvertently omitted from the listing of states appearing in the Company's response to STF 1.2(a). Idaho and Missouri granted the Company authority to provide telecommunications services after the Arizona application was submitted.

STAFF'S SECOND SET OF DATA REQUESTS TO  
CENTRAL TELECOM LONG DISTANCE, INC.  
DOCKET NO. T-20740A-10-0205  
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STF 2.2 The Company's attachment in response to STF 1.4(a) was for the incorrect year. The Balance Sheet for 2008 was excluded from the application. Please provide the Balance Sheet for 2008 as requested. If there is no Balance Sheet available for 2008, please provide the total 2008 assets, total 2008 equities and the 2008 net income/loss and supporting documentation.

**Response:** Please see below.

**Central Telecom Long Distance, Inc**  
**Balance Sheet**  
**As of December 31, 2008**

	<u>Dec 31, 08</u>
<b>ASSETS</b>	
<b>Current Assets</b>	
Checking/Savings	
General Account	4,716.01
Money Market	25,113.19
<b>Total Checking/Savings</b>	<u>29,829.20</u>
<b>Total Current Assets</b>	<u>29,829.20</u>
<b>TOTAL ASSETS</b>	<u><u>29,829.20</u></u>
<b>LIABILITIES &amp; EQUITY</b>	
Equity	
Net Income	29,829.20
<b>Total Equity</b>	<u>29,829.20</u>
<b>TOTAL LIABILITIES &amp; EQUITY</b>	<u><u>29,829.20</u></u>

STAFF'S SECOND SET OF DATA REQUESTS TO  
CENTRAL TELECOM LONG DISTANCE, INC.  
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STF 2.3 Referencing the Company's response to STF 1.9(c), the please clarify if "Carrier" Cost Recovery Fee, as stated on Original Sheet No. 25, Section 3.2.3 the same fee identified on Original Sheet No. 43 and labeled "Cost Recovery Fee".

**Response:** It is. For purposes of clarity, the word "Carrier" has been removed at Section 3.2.3.

STF 2.4 It is Staff's current practice to not allow Carrier Cost Recovery Fees/Cost Recovery Fees as proposed by the Company on Original Page Nos. 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, 35, 36, 37, 38, 39, 43, 44, 45, 46, 47, 48, 49 and 50. Please remove all references and rates associated with this Fee.

**Response:** Company maintains that the Cost Recover Fee is an interstate charge and is being tariffed consistent with Staff's recommendations appearing in the March, 15, 2010 Utilities Division memorandum in Docket No. RT-00000J-05-0329 at Pages 6 and 7, addressing Qwest Long Distance Corporation's interstate surcharge addressed, *viz.*

Staff continues to believe that charges that apply simultaneously to both inter- and intrastate calls should be tariffed.

Additionally, Staff recommends that all intrastate long distance providers, comply with the above Staff interpretation of tariffing rules and statutes.

STF 2.5 It is Staff's current practice to not allow Monthly Access/Service Fees and Access Charges as proposed by the Company on Original Page Nos. 7, 27, 28, 29, 40, 41, 44, 45, 46 and 50. Please remove all references and rates associated with this Fees and Charges.

**Response:** Please refer to response to STF 2.4., *supra.*

STF 2.6 Referencing Attachment B, Original Page No. 16, Section 2.10.4 and Section 2.10.5 appear to be identical. Please remove Section 2.10.5 from this page.

**Response:** Corrected.

**SECTION 2 - RULES AND REGULATIONS, Continued**

**2.10. CANCELLATION BY CUSTOMER**

- 2.10.1 The Company's services consist of Presubscribed interstate and intrastate long distance services bundled with casual calling, travel card and other Subscribed services as set forth in this Tariff.
- 2.10.2 The Customer may only cancel service, whether the Customer is presubscribed or has subscribed, to a Company switched access long distance plan, a casual calling plan, or a calling card, by the following means: (1) the Customer must call the Company's Customer Service Department at 888.988.9818 or (2) write the Company's Customer Service Department at 102 South Tejon Street, Suite 1100, Colorado Springs, CO 80903. The Company cannot accept a request for cancellation of service from an agent or representative of a Customer. Cancellation by the Customer of Presubscribed intrastate and interstate long distance services will not automatically result in the cancellation of casual calling, travel card and other Subscribed services. The Customer must notify the Company of the cancellation of Presubscribed and Subscribed services.
- 2.10.3 The Customer will remain responsible to pay for all monthly fees and charges incurred through the date that the Customer first directly notifies the Company of his or her desire to cancel Presubscribed and Subscribed service(s). Failure to cancel all services will result in the imposition of a monthly fees and charges for the services not cancelled.
- 2.10.4 If a Customer either voluntarily cancels their services with the Company or if the Company cancels the Customer's Presubscribed long distance services for any reason set forth in this Tariff, the Company will have no obligation whatsoever to assist the Customer in any respect in switching from the Company to another carrier.

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Issued:

Effective Date:

Issued By:

Deborah Baker, President  
Central Telecom Long Distance, Inc.  
102 South Tejon Street, Suite 1100  
Colorado Springs, CO 80903  
Telephone: 719.471.2265

**SECTION 2 - RULES AND REGULATIONS, Continued**

**2.10. CANCELLATION BY CUSTOMER, Continued**

2.10.5 Any non-recoverable cost of company expenditures shall be borne by the Customer if:

2.10.5.1. The Customer orders service requiring special facilities dedicated to the Customer's use and then cancels the order before such service begins, before completion of the minimum period or before completion of some period mutually agreed with the Customer for the non-recoverable portions of expenditures; or

2.10.5.2. Liabilities are incurred expressly on behalf of the Customer by Company and not fully reimbursed by installation and monthly charges; and

2.10.5.3. Based on an order for service and construction has either begun or has been completed, but no service provided.

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Issued:

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