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MILLER
ISAR INC.
TRUSTED ADVISORS



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ANDREW O. ISAR

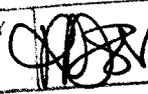
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Via Overnight Delivery

January 19, 2011

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

Arizona Corporation Commission
DOCKETED
JAN 20 2011

DOCKETED BY 

AZ CORP COMMISSION
DOCKET CONTROL

2011 JAN 20 A 11: 31

RECEIVED

Re: Staff's First Set of Data Requests to Liberty-Bell Telecom, LLC, Docket No. T-20752A-10-0307

Dear Sir/Madam:

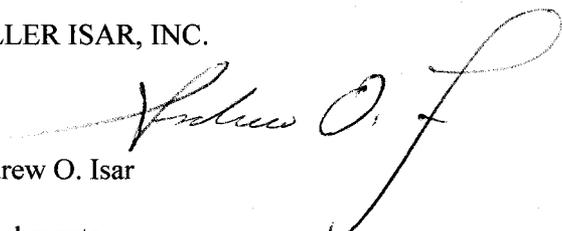
Pursuant to Staff's January 5, 2011 First Set of Data Requests in the above-referenced matter, Liberty-Bell Telecom, LLC ("LBT" or the "Company"), by its regulatory consultants, hereby provides the attached responses.

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

Attachments

Regulatory Consultants to
Liberty-Bell Telecom, LLC

cc: Ms. Pam Genung via electronic delivery (PGenung@azcc.gov)

STAFF'S FIRST SET OF DATA REQUESTS FOR
LIBERTY-BELL TELECOM, LLC.
DOCKET NO. T-20752A-10-0307

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
Liberty-Bell Telecom, LLC

PJG 1-1 Please specify the number of years of telecommunications experience for each of the Key Personnel of Liberty-Bell Telecom, LLC that are identified in Attachment E of Liberty-Bell's Application.

Response:

Nigel Alexander – LLC Manager - 15 years

Christina Neher – Chief Operating Officer – 23 years

Jay Weber – Executive Vice President – 18 years

STAFF'S FIRST SET OF DATA REQUESTS FOR
LIBERTY-BELL TELECOM, LLC.
DOCKET NO. T-20752A-10-0307

PJG 1-2 Please describe Liberty-Bell's plan for providing customer service to its local exchange and interexchange customers in Arizona.

Response: Liberty-Bell has a long standing history of providing exceptional customer service to its subscribers in the State of Colorado, New Mexico, and Utah, which has contributed to the Company's retention of subscribers and growth. The Company has invested in developing and supporting its customer service organization with new technology, and highly-qualified and trained representatives that are fully responsive to customer needs. Liberty-Bell's customer service support to Arizona subscribers represents an extension of the functions performed by its customer service organization, scaled to serve additional subscribers in Arizona.

PJG 1-3 Is Liberty-Bell planning to have a customer service center in Arizona?

PJG 1-4 Is Liberty-Bell planning to have employees in Arizona? If so, please indicate how many.

Response: Liberty-Bell plans to serve its Arizona subscribers from its Iowa and Colorado customer service centers. The Company does not plan to maintain employees in Arizona.

STAFF'S FIRST SET OF DATA REQUESTS FOR
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PJG 1-5 In reference to the Notification of Acquisition of Interest of Liberty-Bell, LLC by DISH Media Holdings Corporation filed on November 22, 2010, please list the name and addresses of any alternative providers of service that are affiliates of DISH Media Holdings Corporation, as defined in R14-2-801.

Response: None of DISH Media Holdings Corporation affiliates (as defined in R14-2-801) constitute alternative providers of service.

STAFF'S FIRST SET OF DATA REQUESTS FOR
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PJG 1-6 Please indicate why you believe that your range of rates is just and reasonable using a competitive market analysis. Your analysis should contain publicly available examples of tariff rates and charges charged by the incumbent and other carriers for similar services. Please provide actual tariff pages and use the attached matrix format to show your actual or proposed tariff rates and charges. Then show each competitor's tariff rates and charges for comparable telecommunications services. At a minimum, show tariff information of Qwest and two other competitors in Arizona. The material you provide should enable Staff to determine whether the tariff rates and charges of the Applicant are just and reasonable compared to other competitors offering the same or similar telecommunications services in Arizona. *(See Attachments A & B – By Competitor) (For the Applicant's ease, an excel file can be provided by contacting Pamela Genung at pgenung@azcc.gov).*

Response: Liberty-Bell Telecom, LLC's rates reflect the Company's underlying costs and a reasonable return, while enabling the Company to remain competitive and attract and retain subscribers in Arizona's highly competitive local exchange and interexchange markets.

The Company's proposed Arizona rates are designed to be competitive with those of other competitive local exchange and interexchange carriers in Arizona, as well as with those of incumbent local exchange carriers. Liberty-Bell Telecom, LLC has designed innovative bundled service offerings that provide subscribers with a full suite of complementary local and interexchange services rather than *a la carte* services, as offered by many competitors that often result in much higher rates.

As a new market entrant, Liberty-Bell Telecom, LLC's could not successfully attract and retain subscribers unless its rates were competitive with larger, more established competitors. Yet Liberty-Bell Telecom, LLC does not have market power to control pricing and could not sustain unreasonably low, anti-competitive service rates through service subsidies in Arizona or elsewhere. Liberty-Bell Telecom, LLC's Arizona rates are consistent with those charged by other competitive local exchange and interexchange carriers operating under Commission-approved tariffs. Liberty-Bell Telecom, LLC's proposed rates should be considered fair, just, and reasonable, accordingly.

An analysis of comparative

ATTACHMENT A
BY COMPETITOR

Residence Maximum Rate Comparison of Telecommunications Services provided by Competitor's in Arizona	Applicant's Arizona Tariff Liberty-Bell Telecom			Competitor #1 Arizona Tariff Cox		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	*			\$13.00	3.1.2.2.(b)	61
Local Service Package with Features	\$60.00	4.2.2	70	\$29.95	3.1.2.2.C.2.	62.1
Service Connect Fee	\$55.00	4.1.1.a	67	\$40.00	3.1.2.(a)	60
Dispatch Call & Trouble isolated on cust. equip.	\$300.00	4.1.1.c	68	*		
Feature Change Order	\$28.50	4.1.1.a	67	\$10.00	3.1.2.(a)	60
Toll Restriction Fee Order	\$10.00	4.3.2	71	\$2.75	3.1.1.2.(c.1)	62
Transfer of Service (move order)	\$55.00	4.1.1.a	67	\$40.00	3.1.2.(a)	60
Restoration of Service	\$35.00	4.1.1.a	67	\$25.00	3.1.3.c.1	65
Directory Assistance	*			\$2.00	3.2.1	93
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	*			*		
Listings						
Directory Listing Service - Primary Listing	\$0.00	3.4.1	64	\$0.00	3.4.6	99
Directory Listing Service - Non-Published	\$32.50	4.1.1.a	67	\$3.00	3.4.6	99
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months	n/a			n/a		
24 Months	n/a			n/a		
36 Months	n/a			n/a		
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	\$0.50	4.6	74	\$0.15	3.1.6	92.0.1

Residence Maximum Rate Comparison of Telecommunications Services provided by Competitor's in Arizona	Competitor #2 Arizona Tariff Qwest			Competitor #3 Arizona Tariff DPI-Teleconnect		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	\$55.00	5.2.4.A.2	2	\$107.00	3.1.1.c.1.b	30
Local Service Package with Features	\$70.00	5.9.1.D.3f	136	*		
Service Connect Fee	\$200.00	5.2.5.A.[1]3.	4	\$80.00	3.1.1.c.1.a	30
Dispatch Call & Trouble isolated on cust. equip.	\$170.00	13.2.D.4	14	*		
Feature Change Order	\$24.00	3.1.9.D.3	2	\$25.00	3.1.1.c.2.a	30
Toll Restriction Fee Order	\$6.00	110.4.2.B	2	*		
Transfer of Service (move order)	*			*		
Restoration of Service	*			\$40.00	3.1.1.c.1.a	30
Directory Assistance	\$1.15	6.2.4B.3.b	23	\$2.25	3.1.1.c.1.b	31
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	*			*		
Listings						
Directory Listing Service - Primary Listing	*			\$0.00	3.2.6	31
Directory Listing Service - Non-Published	*			\$10.00	3.1.1.c.2.b	31
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months	n/a			n/a		
24 Months	n/a			n/a		
36 Months	n/a			n/a		
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	*			*		

* Fields not found in specific tariff.

ATTACHMENT B
BY COMPETITOR

Business Maximum Rate Comparison of Telecommunications Services provided by Competitor's in Arizona	Applicant's Arizona Tariff Liberty-Bell			Competitor #1 Arizona Tariff Cox		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	*			\$30.00	3.1.2.(d.1)	62.3
Local Service Package with Features	\$60.00	4.2.1	69			
Service Connect Fee	\$55.00	4.1.1.a	67	\$50.00	3.1.2.a	60
Dispatch Call & Trouble isolated on cust. equip.	\$300.00	4.1.1.c	68	*		
Feature Change Order	\$30.00	4.1.1.a	67	\$10.00	3.1.2.(a)	60
Toll Restriction Fee Order	\$10.00	4.3.1	71	\$25.00	7.1.2	106
Transfer of Service (move order)	\$74.00	4.1.1.a	67	*		
Restoration of Service	\$60.00	4.1.1.a	67	\$25.00	3.1.2.a	60
Directory Assistance	*			\$2.00	3.2.1	93
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	*					
Listings						
Directory Listing Service - Primary Listing	\$0.00	3.4.1	64	\$0.00	3.4.6	99
Directory Listing Service - Non-Published	\$38.00	4.1.1.a	67	\$5.00	3.4.6	99
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months						
24 Months						
36 Months						
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	\$0.50	4.6	74	\$0.15	3.1.6	92.0.1

Business Maximum Rate Comparison of Telecommunications Services provided by Competitor's in Arizona	Competitor #2 Arizona Tariff Qwest			Competitor #3 Arizona Tariff DPI-Teleconnect		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service				\$107.00	3.1.1.c.1.b	30
Local Service Package with Features	\$85.00	5.2.4.A.2	2			
Service Connect Fee	\$200.00	5.2.5.A[1]3.c	4	*		
Dispatch Call & Trouble isolated on cust. equip.	\$190.00	13.2.D.4	14	\$80.00	3.1.1.c.1.a	30
Feature Change Order	\$24.00	3.1.9.D.3	2	*		
Toll Restriction Fee Order	\$6.00	110.4.2.B	2	\$25.00	3.1.1.c.2.a	30
Transfer of Service (move order)	*			*		
Restoration of Service	*			\$80.00	3.1.1.c.1.a	30
Directory Assistance	\$1.15	6.2.4B.3.b	23	\$40.00	3.1.1.c.1.a	30
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	*			\$2.25	3.1.1.c.1.b	31
Listings						
Directory Listing Service - Primary Listing	*			\$0.00	3.2.6	31
Directory Listing Service - Non-Published	*			\$10.00	3.1.1.c.2.b	31
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months						
24 Months						
36 Months						
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	*			*		

* Fields not found in specific tariff.

ATTACHMENT C
BY STATE

Residence Maximum Rate Comparison of Telecommunications Services provided by Applicant in other States	Applicant's Arizona Tariff Arizona			Applicant's Tariff (State #1) Idaho		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	*			*		
Local Service Package with Features	\$60.00	4.2.2	70	\$36.89	4.2.2	68
Service Connect Fee	\$55.00	4.1.1.a	67	\$35.00	4.1.1.a	65
Dispatch Call & Trouble isolated on cust. equip.	\$300.00	4.1.1.c	68	\$149.00	4.1.1.c	66
Feature ChangeOrder	\$28.50	4.1.1.a	67	\$8.50	4.1.1.a	65
Toll Restriction Fee Order	\$10.00	4.3.2	71	\$0.00	4.3.2	69
Transfer of Service (move order)	\$55.00	4.1.1.a	67	\$35.00	4.1.1.A	65
Restoration of Service	\$35.00	4.1.1.a	67	\$25.00	4.1.1.a	67
Directory Assistance						
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	*			*		
Listings						
Directory Listing Service - Primary Listing	\$0.00	3.4.1	64	\$0.00	3.1.1	64
Directory Listing Service - Non-Published	\$32.50	4.1.1.a	67	\$12.50	4.1.1.B	65
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months	n/a			n/a		
24 Months	n/a			n/a		
36 Months	n/a			n/a		
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	\$0.50	4.6	74	\$0.07	4.6	72
Residence Maximum Rate Comparison of Telecommunications Services provided by Applicant in other States	Applicant's Tariff (State #2) Colorado			Applicant's Tariff (State #3) Nebraska		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	\$14.50	4.3.1.B	72	*		
Local Service Package with Features	\$36.89	4.3.1.B	72	\$36.89	4.2.2	67
Service Connect Fee	\$35.00	4.1.8	66	\$35.00	4.1.1.A	64
Dispatch Call & Trouble isolated on cust. equip.	\$149.00	4.1.8	67	\$149.00	4.1.1.C	65
Feature ChangeOrder	\$8.50	4.1.8	66	\$8.50	4.1.1.A	64
Toll Restriction Fee Order	\$2.00	4.3.3.C.1	76	\$0.00	4.3.1	68
Transfer of Service (move order)	\$35.00	4.1.8	66	\$35.00	4.1.1.A	64
Restoration of Service	\$25.00	4.1.3	64	\$25.00	4.1.1.B	64
Directory Assistance						
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	\$20.00	4.1.4	64	*		
Listings						
Directory Listing Service - Primary Listing	\$0.00	3.1.3.L	49.1	\$0.00	3.2.2.D	57
Directory Listing Service - Non-Published	\$12.50	4.1.8	66	\$12.50	4.1.1.A	64
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months	n/a			n/a		
24 Months	n/a			n/a		
36 Months	n/a			n/a		
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	*	4.3.4.A	79	*		

* Fields not found in specific tariff.

ATTACHMENT D
BY STATE

Business Maximum Rate Comparison of Telecommunications Services provided by Applicant in other States	Applicant's Arizona Tariff			Applicant's Tariff (State #1) Idaho		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	*			*		
Local Service Package with Features	\$60.00	4.2.2	70	\$34.99	4.2.1	67
Service Connect Fee	\$55.00	4.1.1.a	67	\$35.00	4.1.1.a	65
Dispatch Call & Trouble isolated on cust. equip.	\$300.00	4.1.1.c	68	\$149.00	4.1.1.c	66
Feature ChangeOrder	\$30.00	4.1.1.a	67	\$10.00	4.1.1.a	65
Toll Restriction Fee Order	\$10.00	4.3.1	71	\$0.00	4.3.1	69
Transfer of Service (move order)	\$74.00	4.1.1.a	67	\$54.00	4.1.1.a	65
Restoration of Service	\$60.00	4.1.1.a	67	\$40.00	4.1.1.B	65
Directory Assistance	*			*		
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	*			*		
Listings						
Directory Listing Service - Primary Listing	\$0.00	3.4.1	64	\$0.00	3.1.1	64
Directory Listing Service - Non-Published	\$38.00	4.1.1.a	67	\$18.00	4.1.1.a	65
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months	n/a			n/a		
24 Months	n/a			n/a		
36 Months	n/a			n/a		
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	\$0.50	4.6	74	\$0.07	4.6	72

Business Maximum Rate Comparison of Telecommunications Services provided by Applicant in other States	Applicant's Tariff (State #2) Colorado			Applicant's Tariff (State #3) Nebraska		
	Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services						
Basic Local Service	\$30.00	4.3.3.A	70	*		
Local Service Package with Features	\$34.99	4.3.3.A	70	\$34.99	4.2.1	66
Service Connect Fee	\$35.00	4.1.8	66	\$35.00	4.1.1.A	64
Dispatch Call & Trouble isolated on cust. equip.	\$149.00	4.1.8	67	\$149.00	4.1.1.C	65
Feature ChangeOrder	\$10.00	4.1.8	66	\$10.00	4.1.1.A	64
Toll Restriction Fee Order	\$5.00	4.3.3.C.1	76	\$0.00	4.3.1	68
Transfer of Service (move order)	\$54.00	4.1.8	66	\$54.00	4.1.1.A	64
Restoration of Service	\$40.00	4.1.3	64	\$40.00	4.1.1.B	64
Directory Assistance						
Miscellaneous Services & Rates						
Returned Check Charge (NSF)	\$20.00	4.1.4	64	*		
Listings						
Directory Listing Service - Primary Listing	\$0.00	3.1.3.L	49.1	\$0.00	3.2.2.D	57
Directory Listing Service - Non-Published	\$18.00	4.1.8	66	\$18.00	4.1.1.A	64
Primary Rate Interface (DS0) Service						
Month-to-month						
12 Months	n/a			n/a		
24 Months	n/a			n/a		
36 Months	n/a			n/a		
Long Distance						
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	*	4.3.4.A	79	*		

* Fields not found in specific tariff.

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DOCKET NO. T-20752A-10-0307

PJG 1-7 Please identify all other states/jurisdictions in which the Company or an affiliate provides telecommunications services. Please specify, in the attached matrix format, the tariff rates and charges that the Company and/or affiliate charges for telecommunications services in these other jurisdictions. If there is a difference between the tariff rates and charges that the Company will charge in Arizona and the tariff rates and charges that the Company and/or affiliate charges in other jurisdictions for telecommunications services; please explain why you are charging different tariff rates and charges in Arizona. The material you provide should enable Staff to determine whether these tariff rates and charges are comparable to the tariff rates and charges charged in other jurisdictions. If this information has already been provided in an earlier data response, please specify as such. *(See Attachments C & D – By State) (For the Applicant's ease, an excel file can be provided by contacting Pamela Genung at pgenung@azcc.gov).*

Response: The Company currently provides services primarily in the State of Colorado, while serving a limited subscriber base in New Mexico and Utah. Liberty-Bell Telecom, LLC's rates in each state are the same as those appearing in the Company's proposed Arizona tariff, Arizona C.C. Tariff No. 1 with the exception of New Mexico and Utah which were inherited rates as part of a previous acquisition by Liberty-Bell. Such rates reflect the underlying cost of Company's service and reasonable return as noted in the Company's response to PJG 1-6.