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M&D MARASHLIAN & DONAHUE, LLC
THE COMMLAW GROUP

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May 14, 2014

Arizona Corporation Commission

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Arizona Corporation Commission
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Phoenix, Arizona 85007-2927

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AZ CORP COMMISSION
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DOCKETED BY

RE: Arizona Corporation Commission – Staff’s First Set of Data Requests for Campus Communications Group, Inc. (“CCG”) Docket No. T-20907A-14-0075

Dear Sir or Madam:

On behalf of Campus Communications Group, Inc. (“CCG” or “Applicant”), this letter responds to the April 17, 2014 letter requesting additional information from the Arizona Corporation Commission (“the Commission”).

1-1. Provide a copy of CCG’s Certificate of Good Standing in Arizona.

RESPONSE: Please see attached Exhibit A.

1-2. Does CCG intend to deploy a facilities-based local exchange network or any elements of a facilities-based local exchange network in Arizona? If yes, please explain if the network or network elements will be based on traditional wireline or Voice over Internet Protocol (“VoIP”) technology.

RESPONSE: CCG intends to deploy a fiber-based local exchange network in Arizona to enable it to provide a full range of voice, data and advanced communications services. Depending on a customer’s specific requirements, these services may be provided using a variety of technologies, including Time Division Multiplexing (“TDM”), Internet Protocol (“IP”), Session Initiation Protocol (“SIP”) or Multiprotocol Label Switching (“MPLS”).

1-3. If CCG will not be installing its own facilities to provide telecommunications services in Arizona, will it be leasing facilities from other service providers? If so, please identify those providers by name.

RESPONSE: CCG intends to install its own facilities to provide telecommunications services in Arizona.

MARASHLIAN & DONAHUE, LLC

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1-4. If CCG intends to deploy a VoIP facilities-based local exchange network that interconnects directly to the Public Switched Telephone Network ("PSTN") or any VoIP network elements that interconnect directly to the PSTN, please respond to the following:

(a) Does CCG understand that all VoIP services and traffic directly interconnecting to the PSTN will be under the jurisdiction of the Commission's CC&N authority?

RESPONSE: CCG understands that by seeking a CC&N, certain of its regulated services may be subject to the Commission's authority.

(b) Does CCG understand that all VoIP customers, lines and revenues are to be included in Commission required or requested reports such as Annual Reports due by April 15 of each year?

RESPONSE: CCG understands that it must report customers, lines and revenue in accordance with the Commission's rules and applicable law.

1-5. Will CCG be doing its own billing to its end-users? If not, please identify the name, address, telephone number and contact person of the company that will be doing CCG's billing.

RESPONSE: Yes, CCG will be billing its end-users.

1-6. Please specify the reasons for confidentiality of CCG's financial statements.

RESPONSE: CCG believes its financial information to be proprietary, confidential, non-public commercial information appropriate for protection from disclosure. The financial statements are generated for CCG's use and cannot be replicated or obtained by a third party without CCG's assistance. The information is not a part of the public record in any jurisdiction and is not available to CCG's competitors. CCG could suffer a significant competitive disadvantage if the information is made available to its competitors. There would be no legitimate purpose served by disclosing this sensitive proprietary information to Applicant's competitors or any other person other than Commission Staff responsible for this matter. The risk of potential harm to CCG from disclosing the information outweighs the public's interest in the information's disclosure. Due to the sensitive nature of CCG's financial statements we respectfully submit that a Protective Order pertaining to the Confidential Information is appropriate and request the Commission to limit access to such Confidential Information by the issue of a Protective Order.

1-7. Should Staff agree to a confidentiality agreement of the financial statements, please acknowledge that CCG will still be required to allow Staff to include four figures in its Staff Report – Net Income, Total Assets, Total Equity, and the Net Book Value of all Arizona jurisdictional assets. The Staff Report will be made available on the Commission’s publicly accessible e-docket system.

RESPONSE: CCG acknowledges this requirement.

1-8. Please specify whether CCG will rely on the financial resources of its parent company, Pavlov Media, Inc.

RESPONSE: CCG has its own customers and revenue to pay for provision of its service and general operations. Pavlov Media, Inc., its parent company, will provide capital to CCG for building facilities.

1-9. In Attachment A, CCG identified one director/officer of CCG: Mr. Mark A. Scifres. Please specify the number of years of telecommunications experience of Mr. Scifres.

RESPONSE: Mr. Mark A. Scifres has a total of 18 years of telecommunications expertise.

1-10. Please identify where CCG’s headquarters is located.

RESPONSE:
206 North Randolph Street
Suite 200
Champaign, IL 61820

1-11. Please state the year that CCG was founded.

RESPONSE: CCG was founded in 2001.

1-12. Please describe CCG’s plan for providing customer service and maintenance to its local exchange customers in Arizona (e.g. through use of contractors, another service provider (identify company), 24x7 access number to call or other contact means for customers to use).

RESPONSE: CCG will have service technicians available to repair and maintain company-owned equipment. Applicant will rely on service and repair technicians in Arizona, provided from its parent company, Pavlov Media, to service and repair facilities leased from other carriers. Customer complaints will be handled internally through the

company's customer service department. Customers will be notified of their ability to contact the Commission and seek resolution of complaints in a manner consistent with Commission rules.

CCG has made arrangements for its customers to call the company at its toll-free customer service number 1-888-799-7249. In addition, customers may contact the company in writing at the headquarters address, as well as via email at molinc@pavlovmedia.com. The toll free number will be printed on the customer's monthly billing statements.

1-13. Is CCG planning to have a customer service center in Arizona?

RESPONSE: No.

1-14. Is CCG planning to have employees in Arizona? If so, please indicate how many.

RESPONSE: No.

1-15. Please indicate the total number of employees of CCG and its affiliates.

RESPONSE: 115

1-16. In response to (E-3) of the Application form, CCG states that it will not have a switch in Arizona. Please specify where CCG's switch is located so that CCG's Arizona end-users' telecommunications traffic will be routed.

RESPONSE: CCG's switch is located in Bloomington, Illinois with a redundant link established in Chicago, Illinois.

1-17. Please specify the type(s) of business end-user customers (e.g. small, medium, large business) in Arizona that CCG intends to provide service.

RESPONSE: CCG intends to provide service to business end-user customers of all sizes.

1-18. As indicated in response to (A-15) of the Application form, CCG states "CCG will not be providing services as a local exchange reseller..." meanwhile on Original Page No. 7 of CCG's proposed Intrastate Local Telephone Service Tariff, Arizona Tariff No. 1, a definition for Resold Local Exchange Service is listed. Is this definition necessary if CCG will not be providing resold local exchange service? If so, please provide CCG's reasoning for keeping the definition in its proposed tariff. If the definition does not need to be in the tariff, please file a replacement page to CCG's proposed tariff.

RESPONSE: CCG is not providing resold local exchange services. We have removed the definition of 'resold local exchange service' from page 7 of the tariff and have attached the revised page here as Exhibit B.

- 1-19. A. Please confirm whether you have or intend to have any residential customers. If so, will the rates offered to them be the same as your business customers?

RESPONSE: CCG does not intend to have any residential customers. Discussions with Staff have indicated that customers such as universities and apartment buildings do not fall within the confines of 'residential customers.'

- B. Will CCG be providing a basic local service offering to both residential and business customers?

RESPONSE: CCG will not be providing a basic local service offering. Given the nature of the services CCG provides, it would be irrelevant to provide the distinction between local and long distance/toll service. CCG's basic level of service will include unlimited local and long distance calling for a fixed monthly rate. CCG does not provide service directly to residential customers.

- C. In CCG's Metered service offering a monthly rate of \$19.95 and a maximum rate of \$59.85, in addition to a measured local calling rate of \$0.03/minute. Does the maximum rate mean that including \$0.03/minute the customer would not be charged any higher per month than \$59.85 regardless of the number of minutes used? Does the maximum rate mean that \$19.95 is CCG's current/effective rate but that it could increase its current/effective rate up to a maximum rate of \$59.85? Please further explain this maximum rate.

RESPONSE: The metered service monthly rate of \$19.95 is a fixed monthly charge for unlimited local calling. Once a customer initiates a long distance call, the rate of \$0.03/minute is charged. The unlimited local calling does not have a customer cap on the number of local minutes used. The maximum rate of \$59.85 is one that was generated for purposes of the Arizona tariff. CCG represents the standard fixed charge and the \$0.03/minute charge on its state tariffs in jurisdictions requiring tariffs.

CCG directs its services to business customers and provides different rates for customers based on needs and usage, and through separate customer contracts.

- D. In regards to CCG's Unlimited US service offering, please further explain the maximum rate listed for this service as well.

RESPONSE: CCG's Unlimited US service offering's standard monthly rate is \$39.95. Once a customer reaches 3,000 total minutes in a month, all minutes of use after that cap will be charged at a rate of \$0.03/minute. This is listed on all state tariffs that CCG maintains. However, as stated in the discussion above, the maximum rate of \$119.85 was generated for purposes of the Arizona tariff filing, as the Arizona Corporation Commission requires posting of a maximum rate.

- 1-20. 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. 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.

RESPONSE: CCG's range of rates is just and reasonable. As shown in Exhibit C CCG's rates are comparable to its competitors in Arizona offering similar services and are the same as its rates in other states. CCG developed its pricing to offer consistent rates throughout the country so that it can focus on arrangements that meet the specific needs and unique circumstances of each customer rather than state-specific rates. CCG's proposed rates are consistent with other competitive local exchange carriers providing similar services in Arizona, and, therefore, should be considered reasonable as filed. However, CCG can align its Arizona rates with those of the incumbent local exchange carriers in Arizona at the request of the Arizona Corporation Commission. See attached Exhibit C.

- 1-21. 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.

RESPONSE: CCG has authority to provide telecommunications services in Illinois, Texas, Georgia, North Carolina, Florida, and Kentucky. The tariff rates and charges that the Company charges for telecommunications services in these other jurisdictions is the same as the rates offered in Arizona. CCG does not anticipate any immediate change in the charged tariff rates and charges among the states CCG offers services. As noted, CCG developed its rates to be consistent on a nationwide basis. However, these other states do not require maximum rates to be set, so the maximums provided for in the Arizona tariff will not be provided in the other state tariffs. The rates included in the 'Maximum Rate Comparison,' are the standard rates offered by CCG in Illinois, Texas, and Georgia. See attached Exhibit D.

Applicant is authorized to provide the same services for which it is currently seeking authority in Arizona, Kentucky and North Carolina. However, these jurisdictions regulate such services on a detariffed basis. Therefore, Applicant does not maintain tariffs with these particular state commissions, but rather use nationwide rates as laid out in Exhibit D for Illinois and Arizona.

The rates for Texas as represented in Exhibit D are based off an original tariff filed by Applicant with the Texas Public Utilities Commission. Illinois and Texas were the original two jurisdictions in which Applicant began offering services. As the structure and rates of services have changed since the commencement of services, Applicant has updated its Illinois tariff. However, Applicant has not yet updated its Texas tariff to reflect the rates found in all other tariffs it maintains and as are represented in Exhibit D. Applicant intends to do this in the immediate future, with rates aligning with those in all other CCG state tariffs.

While CCG is authorized to provide services in Florida, a Consummating Order has not yet been issued after which a tariff would be effective in the state. However, while a tariff is not yet on file in Florida, it will maintain the same structure and rates as laid out in CCG's other state tariffs, as CCG maintains nationwide rates.

Should you have any questions regarding these responses or require further information, please contact the undersigned at vmp@commlawgroup.com or (703) 714-1309.

Respectfully submitted,



Vineetha Pillai
Counsel for Campus Communications Group, Inc.

cc: Pamela J. Genung (via e-mail)

EXHIBIT A

Arizona Certificate of Good Standing

STATE OF ARIZONA



Office of the
CORPORATION COMMISSION

CERTIFICATE OF GOOD STANDING

To all to whom these presents shall come, greeting:

I, Jodi A. Jerich, Executive Director of the Arizona Corporation Commission, do hereby certify that

*****CAMPUS COMMUNICATIONS GROUP INC*****

a foreign corporation organized under the laws of Delaware did obtain authority to transact business in the State of Arizona on the 10th day of February 2014.

I further certify that according to the records of the Arizona Corporation Commission, as of the date set forth hereunder, the said corporation has not had its authority revoked for failure to comply with the provisions of the Arizona Business Corporation Act; and that its most recent Annual Report, subject to the provisions of A.R.S. sections 10-122, 10-123, 10-125 & 10-1622, has been delivered to the Arizona Corporation Commission for filing; and that the said corporation has not filed an Application for Withdrawal as of the date of this certificate.

This certificate relates only to the legal authority of the above named entity as of the date issued. This certificate is not to be construed as an endorsement, recommendation, or notice of approval of the entity's condition or business activities and practices.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the official seal of the Arizona Corporation Commission. Done at Phoenix, the Capital, this 6th Day of May, 2014, A. D.




Jodi A. Jerich, Executive Director

By: _____ 1060162

EXHIBIT B

Revised Tariff Page

INTRASTATE LOCAL TELEPHONE SERVICE

SECTION 1 - TECHNICAL TERMS AND ABBREVIATIONS (contd.)

Local Exchange Services - Telecommunications services furnished for use by end-users in placing and receiving local telephone calls within local calling areas.

Normal Business Hours – 9:00 AM To 5:00 PM Monday through Friday, excluding holidays.

Premises - The space occupied by an individual customer in a building, in adjoining buildings occupied entirely by that customer, or on contiguous property occupied by the customer separated only by a public thoroughfare, a railroad right of way or a natural barrier.

PRI – ISDN Primary Rate Interface

Revised: May 12, 2014

Effective:

Issued By: *Mark Scifres, Chief Executive Officer
Campus Communications Group, Inc.
PO Box 25
Champaign, IL 61824*

EXHIBIT C

Competitors Business Maximum Rate Comparison

ATTACHMENT B
BY COMPETITOR

Business Maximum Rate Comparison of Telecommunications Services provided by Competitor's in Arizona		Applicant's Arizona Tariff			Competitor #1 Arizona Tariff <i>Qwest/CenturyLink</i>		
		Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services	Basic Local Service	119.85	3.11.2	42	\$38.00(max) \$31.60	5.2.4	Sec 5 p 15
	Basic Metered	59.85	3.11.1	42	Flat rate		
	Service Connect Fee	49.95	3.11.1				
	Dispatch Call & Trouble isolated on cust. equip.	N/A	3.11.2	42	\$85.00(max) \$42.50	5.2.4	Sec 5 p 15
	Feature Change Order	N/A					
	Toll Restriction Fee Order	N/A					
	Transfer of Service (move order)	N/A					
	Restoration of Service	49.95	3.7	40	\$55.00	2.2.9	Sec 2 p 18
	Directory Assistance				\$1.99(max) \$1.85	6.2.4	Sec 6 p 15
	Miscellaneous Services & Rates						
Returned Check Charge (NSF)	40	3.6	40	\$12.50(max) \$10.00	2.3.2	Sec 2 p 30	
Listings							
Directory Listing Service - Primary Listing	N/A			No charge	5.7.1	Sec 5 p 138	
Directory Listing Service - Non-Published	N/A			\$4.65(max) \$2.59	5.7.1	Sec 5 p 146	
Primary Rate Interface (DS0) Service							
Metered	1376.55	3.10.2	41				
Month-to-month	2756.55	3.10.1	41				
12 Months				\$2364.00(max) \$870.00	5.9.2	Sec 5 p 176	
24 Months				\$2554.00(max) \$760.00	5.9.2	Sec 5 p 176	
36 Months				\$2469.00(max) \$660.00	5.9.2	Sec 5 p 176	
Long Distance							
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	N/A			\$0.10 per minute	103.2.6	Sec 103 p 1	

Business Maximum Rate Comparison of Telecommunications Services provided by Competitor's in Arizona		Competitor #2 Arizona Tariff <i>Broadvox</i>			Competitor #3 Arizona Tariff <i>Hypercube</i>		
		Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services	Basic Local Service	100.00	4.3.7	118	117.00	5.3.2	47
	Service Connect Fee	\$80.00	5.1.1	119	127.50	8.6.2	67
	Dispatch Call & Trouble isolated on cust. equip.	\$160.00	5.1.1	119	189.00	8.6.2	67
	Feature Change Order	\$55.00	5.1.2	119	97.50	8.6.2	67
	Toll Restriction Fee Order	\$55.00	5.1.2	119			
	Transfer of Service (move order)	\$130.00	5.1.1	119			
	Restoration of Service	\$110.00	5.3	125	48.00	8.5.2	65
	Directory Assistance	3.00(max) 2.00	5.7.4	133	3.75	8.2.2	61
	Miscellaneous Services & Rates						
	Returned Check Charge (NSF)	\$25.00	10.2.16	79	25.00	2.5.2	30
Listings							
Directory Listing Service - Primary Listing	No Charge	5.10.3	142				
Directory Listing Service - Non-Published	\$3.60	5.10.3	142	7.05	6.1.3	52	
Primary Rate Interface (DS0) Service							
Month-to-month							
12 Months	\$2,000.00	7.2.4	157	N/A			
24 Months	\$1,800.00	7.2.4	157	N/A			
36 Months	\$1,600.00	7.2.4	157	N/A			
Long Distance							
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)							

EXHIBIT D

CCG TARIFF RATES BY STATE

ATTACHMENT D
BY STATE

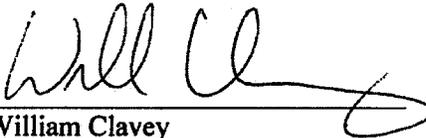
Business Maximum Rate Comparison of Telecommunications Services provided by Applicant in other States		Applicant's Arizona Tariff			Applicant's Tariff (State #1) Illinois (No Maximum Rate)		
		Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services	Basic Local Service	119.85	3.11.2	42	\$39.95	3.11.2	42
	Basic Metered	59.85	3.11.1	42	\$19.95	3.11.1	42
	Service Connect Fee	49.95	3.11.1			3.11.1	
	Dispatch Call & Trouble isolated on cust. equip.	N/A	3.11.2	42	\$49.95	3.11.2	42
	Feature Change Order	N/A			N/A		
	Toll Restriction Fee Order	N/A			N/A		
	Transfer of Service (move order)	N/A			N/A		
	Restoration of Service	49.95		3.7	\$49.95		3.7
	Directory Assistance						
	Miscellaneous Services & Rates						
Returned Check Charge (NSF)	40		3.6	\$40.00		3.6	
Listings							
Directory Listing Service - Primary Listing	N/A		2.23	N/A		2.23	
Directory Listing Service - Non-Published	N/A		2.23	N/A		2.23	
Primary Rate Interface (DS0) Service							
Metered	1376.55		3.10.2	\$458.85		3.10.2	
Month-to-month	2756.55		3.10.1	\$918.85		3.10.1	
12 Months							
24 Months							
36 Months							
Long Distance							
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	N/A			N/A			
		Applicant's Tariff (State #2) Texas			Applicant's Tariff (State #3) Georgia (No Maximum Rate)		
Business Maximum Rate Comparison of Telecommunications Services provided by Applicant in other States		Charges & Rates (\$)	Section Number	Page Number	Charges & Rates (\$)	Section Number	Page Number
Product/Services	Basic Local Service	\$19.84	4.3.1	41	\$39.95	3.11.2	42
	Service Connect Fee	\$51.68	4.3.1	41	\$19.95	3.11.1	42
	Dispatch Call & Trouble isolated on cust. equip.				\$49.95	3.11.1	
	Feature Change Order				N/A	3.11.2	42
	Toll Restriction Fee Order				N/A		
	Transfer of Service (move order)	\$76.28	4.3.1	42	N/A		
	Restoration of Service	\$51.50			N/A		
	Directory Assistance	\$0.90 (per inquiry)			\$49.95		3.7
	Miscellaneous Services & Rates						
	Returned Check Charge (NSF)				\$40.00		3.6
Listings							
Directory Listing Service - Primary Listing	\$1.55	4.3.1	41	N/A		2.23	
Directory Listing Service - Non-Published	\$0.00	4.3.1	41	N/A		2.23	
Primary Rate Interface (DS0) Service							
Metered				\$458.85		3.10.2	
Month-to-month				\$918.85		3.10.1	
12 Months							
24 Months							
36 Months							
Long Distance							
Direct Dialed Station-to-Station (include all relevant billing elements used to make the comparison)	N/A			N/A			

VERIFICATION

I, William Clavey, am the Vice President of Finance of Campus Communications Group, Inc. and I am authorized to make this verification on its behalf. The statements in the foregoing responses to the Arizona Corporation Commission Staff's First Set of Data Requests in Docket No. T-20907A-14-0075 are true of my own knowledge, except as to the matters which are therein stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 13th day of May, 2014.



William Clavey
Vice President of Finance