



0000153482

BEFORE THE ARIZONA CORPORATION

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

COMMISSIONERS
BOB STUMP - Chairman
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

RECEIVED

2014 MAY 21 A 9:51

AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

MAY 21 2014

DOCKETED BY 

IN THE MATTER OF THE APPLICATION OF
MOHAVE COOPERATIVE SERVICES, INC.
FOR A CERTIFICATE OF CONVENIENCE
AND NECESSITY TO PROVIDE
COMPETITIVE RESOLD LONG DISTANCE,
RESOLD LOCAL EXCHANGE AND
FACILITIES-BASED LOCAL EXCHANGE
TELECOMMUNICATIONS SERVICES IN
ARIZONA.

DOCKET NO. T-04268A-14-0050

STAFF'S NOTICE OF FILING

ORIGINAL

The Utilities Division of the Arizona Corporation Commission ("Staff") hereby files the Staff Data Request and company response as ordered by Administrative Law Judge Paternoster in her May 19, 2014 Procedural Order.

RESPECTFULLY SUBMITTED this 21st day of May 2014.


Matthew Laudone, Attorney
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
(602) 542-3402

Original and thirteen (13) copies
of the foregoing filed this
21st day of May 2014 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

1 Copy of the foregoing emailed/mailed
this 21st day of May 2014 to:

2

3 William P. Sullivan
4 Michael A. Curtis
Curtis, Goodwin, Sullivan,
5 Udall & Schwab, PLC
6 501 East Thomas Road
Phoenix, Arizona 85012-3205
wsullivan@cgsuslaw.com
mcurtis401@aol.com

7

8 Kayla Christine

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

STAFF'S FIRST SET OF DATA REQUEST TO
MOHAVE COOPERATIVE SERVICES, INC. ("Mohave" or "Company")
DOCKET NO. T-04268A-14-0050
MARCH 6, 2014

In addition to a paper response, all information responses should also be provided in searchable PDF, DOC or EXCEL files via email or electronic media.

For each answer, please identify by name, title, and address each person providing information that forms the basis for the response provided.

Please make sure each numbered item and each part of the item is answered completely

STF 1.1 In its letter to the Arizona Corporation Commission ("Commission"), Mohave Cooperative Services, Inc. ("Mohave") requests the Commission cancel its Certificate of Convenience and Necessity ("CC&N") to provide telecommunications services in Arizona. Please reply to the following:

- b. On page 2 of the Application, paragraph 4, the Company states it did provide Voice over Internet Protocol ("VoIP") service for up to 125 customers in Mohave County. Please explain what services were provided to those customers. For example, did the Company provide the service equivalent of long distance and/or local exchange services to the above mentioned customers.

Reply: "VoIP" is internet based telephone communication. There is neither a local exchange nor local equipment other than internet connectivity required by the provider. In Mohave's case they resold a VoIP product purchased from XCast Labs out of Los Angeles which provided long distance plans associated with those internet connected services.

Answer prepared by Heath Barker, Manager of Information Technology, 1999 Arena Drive, Bullhead City, Arizona, 86442.

- c. On page 2 of the Application, paragraph 4, the Company states it notified customer of its intent to halt providing VoIP service in March of 2013 and the last customers were successfully transferred to another provider as of August 15, 2013. Please provide a copy of the notice provided directly to VoIP customers.

Reply: Copies of the notices that were sent are included as Attachment STF 1.1.c.

Answer prepared by Arden Lauxman, Chief Financial Officer, 1999 Arena Drive, Bullhead City, Arizona, 86442.

STAFF'S FIRST SET OF DATA REQUEST TO
MOHAVE COOPERATIVE SERVICES, INC. ("Mohave" or "Company")
DOCKET NO. T-04268A-14-0050
MARCH 6, 2014

STF 1.6 Did Mohave ever collect advances, deposits and/or prepayments from customers in Arizona? If so, please indicate the amount of advances, deposits and/or prepayments that been returned to customers in Arizona whose services have been disconnected.

Reply: *To the extent of current management's knowledge, Mohave never collected any advances or deposits from its customers in Arizona. By nature of the business, monthly fees were billed in advance for monthly services at the beginning of those months. Any credit balances that occurred during the close of the business when customers selected another carrier prior to the end of the month that they had paid for were totally refunded to those customers.*

Answer prepared by Arden Lauxman, Chief Financial Officer, 1999 Arena Drive, Bullhead City, Arizona, 86442.

STAFF'S FIRST SET OF DATA REQUEST TO
MOHAVE COOPERATIVE SERVICES, INC. ("Mohave" or "Company")
DOCKET NO. T-04268A-14-0050
MARCH 6, 2014

STF 1.9 Does Mohave have a performance bond or irrevocable sight draft letter of credit ("ISDLOC") on file with the ACC? If yes, please specify the amount of the bond of ISDLOC.

Reply: *Mohave has a performance bond. The amount of the bond is \$135,000.00. The current performance bond will expire April 30, 2014 and Mohave, which is not operating, does not plan to renew the performance bond.*

STAFF'S FIRST SET OF DATA REQUEST TO
MOHAVE COOPERATIVE SERVICES, INC. ("Mohave" or "Company")
DOCKET NO. T-04268A-14-0050
MARCH 6, 2014

STF 1.10 In addition to cancelling its authority to provide telecommunications services in Arizona, is Mohave also requesting to cancel its service tariffs?

Reply: Yes.

Answer prepared by Arden Lauxman, Chief Financial Officer, 1999 Arena Drive, Bullhead City, Arizona, 86442.

ATTACHMENT STF 1.1.c

**Important Notice About Termination of Internet and TV Service With
Mohave Cooperative Services,
Laughlin Ranch Services, and MCS Communications**

Our records show that you have service with Mohave Cooperative Services (MCS), Laughlin Ranch Services (LRS) or MCS Communications (MCSC). Effective March 30, 2012, MCS, LRS and MCSC will discontinue internet and TV service.

You will need to switch your internet and TV service to other providers before March 30, 2012 in order to avoid a disruption to your internet and TV service.

To help you with a smooth transition of your internet service, we have arranged for a different entity known as Wi-Power, in partnership with Mohave Electric Cooperative, as an option to provide both internet and phone service for MCS, LRS and MCSC customers. There are also other different service providers that you may want to consider.

If you are interested in service from Wi-Power to replace your internet service or to add new internet or phone service, please call 1-855-278-4224.

For TV service please contact DirectTV, Suddenlink, or Dish.

Important: MCS, LRS, and MCSC will not be transferring internet or TV service for you, and to transfer you will need to contact your choice of a new provider.

If our equipment is returned, you will not receive a final billing for base services; however Pay Per View charges, if any, will be billed to you. To arrange for a representative to pick up our equipment, please call MCS, LRS, and MCSC at (928) 758-0696 as soon as possible.

If you do not return our equipment, you will be invoiced and receive a bill for all of the services provided to you during the month of March, and we will contact you to collect our equipment.

Subscribers to phone service provided by MCS, LRS, and MCSC will continue to receive the existing phone service. We will automatically establish a new connection necessary for that phone service, unless you opt out of this service. To opt out of this automatic change to your phone service, you will need to select a different internet provider that will integrate with your MCS, LRS, and MCSC phone service and contact that provider directly for internet service. Then, when your new internet service is active, call us at (928) 758-0696 for an appointment to make the necessary changes to your phone equipment.

We are aware that some customers are receiving services without paying for them. These unpaid services will also terminate as of March 30, 2012, and customers will be billed unless they return our equipment.

Mohave Cooperative Services, Laughlin Ranch Services and MCS Communications are discontinuing some services because these operations have lost substantial money historically over the last eight years and continue to do so. As a result we must discontinue those services.

For other questions or concerns please call us at (928) 758-0696.

We apologize for any inconvenience and thank you for your patronage.

Sincerely,

MOHAVE COOPERATIVE SERVICES, INC.

LAUGHLIN RANCH SERVICES

MCS COMMUNICATIONS

