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AZ CORP COMMISSION  
DOCKET CONTROL

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November 25, 2014

HAND-DELIVERY

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

Arizona Corporation Commission

DOCKETED

NOV 25 2014

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RE: **Response of Talk America Services, LLC to Staff's Second Set of Data Requests (STF 2.1-2.14) in Commission Docket T-20918A-14-0342**

Dear Docket Control:

Enclosed are Talk America Services, LLC's responses to STF 2.1-2.14. These responses were supplied to Staff on November 24, 2014, by email and hand-delivery.

Sincerely,



Joan S. Burke

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS TO  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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Talk America Services, LLC ("TAS") hereby provides the following responses to Staff's Second Set of Data Requests ("Requests"). TAS's responses to the Requests are based on the best information presently available and only include data applicable to TAS's operations in Arizona unless otherwise stated. TAS reserves the right to amend, supplement, correct, or clarify any response provided herein if other or additional information is obtained.

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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**STF 2.1** Please provide a copy of a Certificate of Good Standing for the state in which Communication Sales and Leasing, Inc. is incorporated.

**RESPONSE:** See Exhibit A attached hereto.

**RESPONSIBLE:** Cesar Caballero – Sr. Regulatory Counsel  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**STF 2.2** Is the company aware that according to A.A.C. R14-2-1201(6)(d) a requirement of providing Local Exchange service in Arizona is that 911 service also be provided? Please explain how Talk America Services, LLC will provide 911 service to its customers in Arizona and provide a certification that in accordance with A.A.C. R14-2-1201(6)(d) and Federal Communications Commission ("FCC") 47 CFR Sections 64.3001 and 64.3002, it will provide all customers with 911 and E911 service, where available, or will coordinate with ILECs and emergency service providers to provide 911 and E911 service.

**RESPONSE:** Talk America Services, LLC is aware of the requirement for local exchange providers to provide 911 services to its customers. Through a resale agreement with the Windstream CLECs, Talk America Services, LLC, will provide all required 911 services. See Exhibit B attached hereto, which contains the Commission's requested certification.

**RESPONSIBLE:** Jeffery W. Small, SVP– Corp. Development & Operations  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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**STF 2.3** Please clarify for Staff the affiliation Talk America Services, LLC has with the other companies listed in the response to (A-17) of the Application and how it does not meet the definition of an "Affiliate" under A.A.C. R14-2-801(1).

**RESPONSE:** Talk America Services, LLC is an indirect subsidiary of Communications Sales & Leasing, Inc. and will not be a corporate affiliate of McLeodUSA Telecommunications Services, LLC, Paetec Communications, Inc., or Talk America, Inc. However, a lease agreement will exist between Communications Sales & Leasing, Inc. and Windstream Holdings, Inc. for the benefit of the Windstream CLECs in Arizona. Pursuant to the lease agreement, the Windstream CLECs in Arizona will have a long term exclusive use of communications facilities owned by Communications Sales & Leasing, Inc.

TAS will provide service via resale to residential customers only. This is a simple CC&N for authority to provide that service.

**RESPONSIBLE:** Cesar Caballero – Sr. Regulatory Counsel  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**STF 2.4** Please explain why Talk America Services, LLC's is projecting a net book value after the end of the first twelve months of service of \$0.

**RESPONSE:** Because Talk America Services, LLC provides its services over leased networks, it will not own any fixed assets in Arizona and accordingly, the Talk America Services pro forma financial statements did not include any property, plant and equipment.

**RESPONSIBLE:** Cesar Caballero – Sr. Regulatory Counsel  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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**STF 2.5** In reference to Attachment A provided in response to STF 1.12, please explain why the paragraph referencing A.R.S. § 40-282 was not included in the example Publication of Legal Notice.

**RESPONSE:** The Applicant will reinsert the paragraph referenced in STF 2.5. See revised notice attached as **Exhibit C.**

**RESPONSIBLE:** Joan S. Burke, Counsel for Applicant  
1650 N. First Avenue, Phoenix AZ 85003

**STF 2.6** In regards to Attachment B provided in response to STF 1.5, given that Communication Sales & Leasing is or will be the parent company of Talk America services, please explain the corporate relationship between Talk America Services and CSL Capital.

**RESPONSE:** Communications Sales & Leasing will be the publicly traded parent company of Talk America Services, LLC and CSL Capital. CSL Capital will be a direct subsidiary of Communications and Sales Leasing and the direct holding company of Talk America Services, LLC.

**RESPONSIBLE:** Cesar Caballero – Sr. Regulatory Counsel  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**STF 2.7** In the response to STF 1.17, Talk America Services, LLC indicated it will not take more than 14 business days to acknowledge received complaints. Please clarify if this response time applies to only written complaints or also includes complaints received via the toll free number. Please also indicate the address, either street or email or both, to which customers would deliver written complaints.

**RESPONSE:** Talk America Services, LLC, will strive to respond and resolve all customer complaints as quickly as possible. If a complaint is received in writing, Talk America Services, LLC, will acknowledge receipt of the complaint in no more than 14 business days, most complaints will be responded to in less than 7 days. Written complaints can be sent to: Talk America Services, LLC, 2134 W. Laburnum Ave., Richmond, VA 23227.

**RESPONSIBLE:** James Severance, Director – Consumer Service  
2134 W. Laburnum Ave., Richmond, VA 23227

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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**STF 2.8** In follow-up to STF 1.18, will Talk America Services, LLC have any maintenance and repair personnel located in Arizona?

**RESPONSE:** Talk America Services, LLC will not have any employees located in Arizona. All maintenance and repair activity will be managed through the resale agreement with the Windstream CLECs.

**RESPONSIBLE:** James Severance, Director – Consumer Service  
2134 W. Laburnum Ave., Richmond, VA 23227

**STF 2.9** In follow-up to the response to STF 1.4, please provide documentation (tariff pages, etc.) of examples of other local exchange carriers in Arizona that offer service plan(s) with a minutes of use cap but also describe the plan(s) as “unlimited”.

**RESPONSE:** To ease any discomfort the Commission may have, Talk America Services, LLC will amend its proposed tariff to remove the 5,000 minutes of use cap and replace it with more general language limiting the service to residential uses. (A proposed revised tariff page is attached at **Exhibit D.**)

**RESPONSIBLE:** James Severance, Director – Consumer Service  
2134 W. Laburnum Ave., Richmond, VA 23227

**STF 2.10** Referencing tariff Page 47, Section 3.4.9, as well as Attachment C provided in response to STF 1.19, the Company proposed charge for Payphone Surcharge is \$0.70. However, the Arizona Commission doesn't allow for more than a \$.60 maximum Surcharge. Would the Company be willing to change this tariff sheet to reflect a maximum Payphone Surcharge of \$.60?

**RESPONSE:** Yes. The Company will amend its proposed tariff to reflect a maximum Payphone Surcharge of \$0.60. (A proposed revised tariff page is attached at **Exhibit D.**)

**RESPONSIBLE:** James Severance, Director – Consumer Service  
2134 W. Laburnum Ave., Richmond, VA 23227

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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**STF 2.11** Referencing tariff Page 47, Section 3.3.1, as well as Attachment C provided in response to STF 1.19, the Company proposed current charge for Non-Published Directory Listing is \$5.95 and the Company proposed maximum charge is \$10.00. The Company's comparison in Attachment C shows these charges to be excessive. Please explain why the Company believes that these proposed rates are just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any supporting materials.

**RESPONSE:** The Company will amend its proposed tariff to replace the charges described above with a revised current charge of \$1.90 and a maximum charge of \$3.80, consistent with rates that have been previously approved by the Commission. (A proposed revised tariff page is attached at **Exhibit D.**)

**RESPONSIBLE:** James Severance, Director – Consumer Service  
2134 W. Laburnum Ave., Richmond, VA 23227

**STF 2.12** Referencing tariff Page 47, Section 3.3.2, as well as Attachment C provided in response to STF 1.19, the Company proposed current charge for Non-Listed Directory Listing is \$5.95 and the Company proposed maximum charge is \$10.00. The Company's comparison in Attachment C shows these charges to be excessive. Please explain why the Company believes that these proposed rates are just and reasonable using a fair value or cost basis. Please include economic justification or cost support data. Please include any supporting materials.

**RESPONSE:** The Company will revise its proposed tariff to include current charge of \$1.50 for Non-Listed Directory Listing and a maximum charge of \$3.00, consistent with rates that have been previously approved by the Commission. (A proposed revised tariff page is attached at **Exhibit D.**)

**RESPONSIBLE:** James Severance, Director – Consumer Service  
2134 W. Laburnum Ave., Richmond, VA 23227

**STF 2.13** In follow-up to the response provided to STF 1.13, Staff is unable to confirm Talk America Services has been granted authority to provide telecommunications services in Iowa. Please provide a copy of the Order granting such authority in Iowa.

**RESPONSE:** See **Exhibit E** attached hereto.

**RESPONSIBLE:** Cesar Caballero – Sr. Regulatory Counsel  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**ARIZONA CORPORATION COMMISSION  
STAFF'S SECOND SET OF DATA REQUESTS  
TALK AMERICA SERVICES, LLC  
("TAS" OR "THE COMPANY")  
DOCKET NO. T-20918A-14-0342  
RESPONSES DATED NOVEMBER 24, 2014**

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**STF 2.14** Please provide a second year of financial information as requested by Application request (B-2).

**RESPONSE:** See **Exhibit F** attached hereto (removed for Docket filing).

**RESPONSIBLE:** Jeffery W. Small, SVP – Corp. Development & Operations  
4001 N. Rodney Parham Rd, Little Rock, AR 72212

**EXHIBITS**

Exhibit A – Certificate of Good Standing  
Exhibit B – 911 Certification  
Exhibit C – Revised Notice of Application  
Exhibit D – Revised Tariff Pages  
Exhibit E – Iowa Certification Order  
Exhibit F – Confidential Financial Records

# Exhibit A

**STATE OF MARYLAND**  
**Department of Assessments and Taxation**

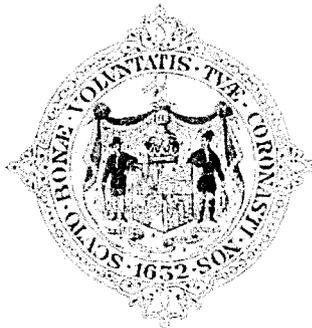
I, PAUL B. ANDERSON OF THE STATE DEPARTMENT OF ASSESSMENTS AND TAXATION OF THE STATE OF MARYLAND, DO HEREBY CERTIFY THAT THE DEPARTMENT, BY LAWS OF THE STATE, IS THE CUSTODIAN OF THE RECORDS OF THIS STATE RELATING TO THE FORFEITURE OR SUSPENSION OF CORPORATIONS, OR THE RIGHTS OF CORPORATIONS TO TRANSMIT BUSINESS IN THIS STATE, AND THAT I AM THE PROPER OFFICER TO EXECUTE THIS CERTIFICATE.

I FURTHER CERTIFY THAT COMMUNICATIONS SALES & LEASING, INC., INCORPORATED SEPTEMBER 04, 2014, IS A CORPORATION DULY INCORPORATED AND EXISTING UNDER AND BY VIRTUE OF THE LAWS OF MARYLAND AND THE CORPORATION HAS FILED ALL ANNUAL REPORTS REQUIRED, HAS NO OUTSTANDING LATE FILING PENALTIES ON THOSE REPORTS, AND HAS A RESIDENT AGENT. THEREFORE, THE CORPORATION IS AT THE TIME OF THIS CERTIFICATE IN GOOD STANDING WITH THIS DEPARTMENT AND DULY AUTHORIZED TO EXERCISE ALL THE POWERS RECITED IN ITS CHARTER OR CERTIFICATE OF INCORPORATION, AND TO TRANSMIT BUSINESS IN MARYLAND.

IN WITNESS WHEREOF, I HAVE HEREUNTO SUBSCRIBED MY SIGNATURE AND AFFIXED THE SEAL OF THE STATE DEPARTMENT OF ASSESSMENTS AND TAXATION OF MARYLAND AT BALTIMORE ON THIS NOVEMBER 21, 2014.



Paul B. Anderson  
Charter Division



301 West Preston Street, Baltimore, Maryland 21201  
Telephone Balto. Metro (410) 767-1340 / Outside Balto. Metro (888) 246-5941  
MRS (Maryland Relay Service) (800) 735-2258 TT/Voice  
Fax (410) 333-7097

## Exhibit B

STATE OF ARKANSAS

§

COUNTY OF PULASKI

§

SS:

§

**CERTIFICATE**

I, Jeffery W. Small, do hereby state that I am Senior Vice President – Corporate Development and Operations of Talk America Services, LLC; that I am authorized to make this Certification on behalf of Talk America Services, LLC; that Talk America Services, LLC will comply with all 911 and E911 service requirements set forth in A.A.C. R14-2-1201(6)(d) and Federal Communications Commission 47 CFR Sections 64.3001 and 64.3002.

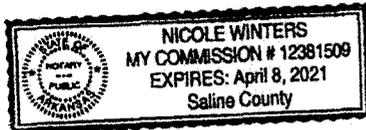
By: Jeffery Small  
Jeffery W. Small  
Senior Vice President –  
Corporate Development and  
Operations  
Talk America Services, LLC

Subscribed and affirmed before me this 24<sup>th</sup> day of November, 2014.

Nicole Winters  
Notary Public

My Commission expires: April 8, 2021

Seal:



# Exhibit C

**NOTICE OF APPLICATION FOR A  
CERTIFICATE OF CONVENIENCE AND NECESSITY TO PROVIDE  
RESOLD LONG DISTANCE AND RESOLD LOCAL EXCHANGE  
TELECOMMUNICATION SERVICES BY TALK AMERICA SERVICES, LLC  
(DOCKET NO. T-20918A-14-0342)**

Time Talk America Services, LLC ("Applicant") has filed with the Arizona Corporation Commission ("Commission") an application for a Certificate of Convenience and Necessity ("Certificate") to provide competitive resold long distance telecommunications services and competitive resold local exchange telecommunication services in the State of Arizona. Applicant will be required by the Commission to provide this service under the rates and charges and terms and conditions established by the Commission.

A.R.S. § 40-282 provides that the Commission may act on an application for a Certificate to provide resold telecommunications services without a hearing, or with a hearing, if one is requested by any party. Applicant or any other party must request a hearing within twenty (20) days of the date of this notice, or the Commission will rule on the application without a hearing.

The applications, report of the Commission's Utilities Division Staff, and any written exceptions to the Staff report prepared by the applicant are available for inspection during regular business hours at the offices of the Commission located at 1200 West Washington Street, Phoenix, Arizona 85007, and at the office of counsel for the Applicant, 1650 N. 1<sup>st</sup> Avenue, Phoenix, Arizona, 85003.

Under appropriate circumstances, interested parties may intervene in the proceedings, and participate as a party. Intervention shall be in accordance with the A.A.C. R14-3-105, except that all motions to intervene must be filed on or within twenty (20) days of the date of this notice. You may have the right to intervene in the proceedings, or you may make a statement for the record. If you have any comments, mail them to:

The Arizona Corporation Commission  
Attention Docket Control  
RE: Talk America Services, LLC  
Docket No. T-20918A-14-0342  
1200 West Washington Street  
Phoenix, Arizona 85007

All Comments should be received within twenty (20) days of the date of this notice.

If you have any questions about this application or have any objections to its approval, you may contact the Consumer Services Section of the Commission at 1200 West Washington Street, Phoenix, AZ 85007, or call (602) 542-4251 or (800) 222-7000.

The Commission does not discriminate on the basis of disability in admission to its public meetings. Persons with a disability may request reasonable accommodations such as a sign language interpreter, as well as request this document in an alternative format, by contacting Shaylin Bernal, ADA Coordinator, phone number (602) 542-3931, or Email at [SBernal@azcc.gov](mailto:SBernal@azcc.gov). Requests should be made as early as possible to allow time to arrange the accommodations.

# Exhibit D

### 3.0 Services, Rates, and Charges

#### 3.1 Local Service Overview

##### 3.1.1 Nature of Service

Local Service is a service that allows customers to originate non-toll local calls at locations within the service areas in which Company has been approved for certification for termination within the local calling area (including any applicable EAS areas) of those locations. Subject to service availability and the package selection by the customer, Local Service may include services in addition to those required for completion of non-toll local calls (including services which may not be subject to regulation under this tariff) which are purchased as part of a bundled package.

##### 3.1.2 Availability

Company offers local service in the areas in which it has been certified by the Arizona Corporation Commission and in which Company has available required network facilities or is able to lease required network facilities to enable the offering of service. Some services and features may not be available in all areas, or may slightly vary between service areas contingent on network availability or configuration. Company will provide the most feature rich version of a feature in the bundled Local Service package available in a given market depending on network availability or configuration.

##### 3.1.3 Local Service Packages

The standard elements of local line packages consist of local dial tone and unlimited local calling unless otherwise noted in a service specific description. Mandatory extended area service ('EAS') is provided where applicable for the prices set forth in the Rate Tables. Local service packages are provided for residential uses only. Service may be suspended or terminated, after proper notice, if it is determined that a Customer is using the service for non-residential applications, such as commercial facsimile, auto-dialing, or telemarketing.

3.0 Services, Rates, and Charges (Cont'd)

3.4 Nonrecurring Charges (Cont'd)

3.4.9 Payphone Surcharge

Payphone Surcharge      \$0.60 / per call

Payphone Surcharge is applied to all intrastate, interstate and international calls that originate from any domestic pay telephone used to access Company services. This charge is in addition to standard tariffed usage charges and surcharges.

3.4.10 [Reserved for Future Use]

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 3.0 Services, Rates, and Charges (Cont'd)
3.3 Directory Listing Service

For each Customer of Company-provided Exchange Access Service(s), the Company shall arrange for the listing of the Customer's main billing telephone number in the directory(ies) published by the dominant Local Exchange Carrier in the area at no additional charge. At a Customer's option, the Company will arrange for optional listing services, subject to availability, at the rates following

3.3.1 Non-Published Listing

A non-published listing is not listed in either the alphabetical section of the dominant Local Exchange Company's directory or Company directory assistance records and will not be furnished upon request of a calling party. The Company will complete an incoming call to a Customer with a non-published listing only when the calling party places the call by number.

	Monthly Recurring Charge	
	<u>Current</u>	<u>Maximum</u>
Each Non-Published Listing	\$1.90	\$3.80

3.3.2. Non-Listed Listing

A non-listed listing is not listed in the alphabetical section of the dominant Local Exchange Company's directory, but is maintained on Company directory assistance records and will be furnished upon request of a calling party. In the absence of gross negligence or willful misconduct, no liability for damages arising from publishing a non-listed telephone number in the directory shall attach to the Company.

	Monthly Recurring Charge	
	<u>Current</u>	<u>Maximum</u>
Each Non-Listed Listing	\$1.50	\$3.00

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 Issued: August 12, 2014

BY: SVP- Corporate Development and Operations  
 4001 N Rodney Parham Rd  
 Little Rock, AR 72212

Effective:

# Exhibit E

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:  TALK AMERICA SERVICES, LLC	DOCKET NO. TCU-2014-0005
	CERTIFICATE NO. 0367

**CERTIFICATE**

(Issued October 7, 2014)

On August 8, 2014, Talk America Services, LLC (Talk America), filed with the Utilities Board (Board) an application for a certificate of public convenience and necessity, pursuant to Iowa Code § 476.29. A supplement to the application was filed on September 3, 2014. The application, as supplemented, is identified as Docket No. TCU-2014-0005.

An order approving the application is being issued concurrently with this certificate. The Board will issue Certificate No. 0367 authorizing Talk America to provide local exchange service in the following Iowa exchanges:

Algona, Alta, Ames, Ankeny, Anamosa, Atlantic, Boone, Blairsburg, Britt, Burlington, Cedar Falls, Coggon, Charles City, Cherokee, Clinton, Carlisle, Carroll, Decorah, Des Moines, Dubuque, Davenport, Fort Madison, Indianola, Independence, Iowa City, Iowa Falls, Keokuk, Lansing, Marion, Monticello, Maquoketa, Marshalltown, Muscatine, Mason City, Missouri Valley, Mount Vernon, Nashua, Oelwein, Onawa, Oskaloosa, Ottumwa, Pocahontas, Polk City, Parkersburg, Perry, Red Oak, Sheldon, Shenandoah, Storm Lake, Stuart, Sioux City, Sioux Rapids, Underwood, Vinton, Waukee, Webster City, and Waterloo.

**IT IS THEREFORE ORDERED:**

This certificate of public convenience and necessity, issued pursuant to Iowa Code § 476.29(1), authorizes Talk America Services, LLC, to furnish local telephone services in the Iowa exchanges listed in this certificate.

**UTILITIES BOARD**

/s/ Elizabeth S. Jacobs

/s/ Nick Wagner

ATTEST:

/s/ Joan Conrad  
Executive Secretary

/s/ Sheila K. Tipton

Dated at Des Moines, Iowa, this 7<sup>th</sup> day of October 2014.

STATE OF IOWA  
DEPARTMENT OF COMMERCE  
UTILITIES BOARD

IN RE:

TALK AMERICA SERVICES, LLC

DOCKET NO. TCU-2014-0005

**ORDER GRANTING APPLICATION FOR CERTIFICATE, APPROVING  
CONCURRENCE IN MAPS, AND ISSUING CERTIFICATE**

(Issued October 7, 2014)

On August 8, 2014, Talk America Services, LLC (Talk America), filed an application with the Utilities Board (Board) for issuance of a certificate of public convenience and necessity pursuant to Iowa Code § 476.29 stating its intention to provide local exchange service in Iowa. Talk America filed a supplement to its application on September 3, 2014. The application, as supplemented, has been identified as Docket No. TCU-2014-0005. Talk America has provided financial statements and the qualifications of its company officers and has stated it will support a 2-PIC dialing methodology for dialing parity.

On August 8, 2014, the Consumer Advocate Division of the Department of Justice (Consumer Advocate) filed a conditional objection to Talk America's application requesting additional time to investigate the details of the application. On September 17, 2014, Consumer Advocate withdrew its objection stating that based on the information included in the supplemented application, Consumer Advocate no longer had any objection to the Board approving Talk America's application.

Iowa Code § 476.29(2) provides that a local exchange carrier shall not be denied a certificate if the Board finds that the applicant "possesses the technical, financial, and managerial ability to provide the service it proposes to render and the Board finds the service is consistent with the public interest."

The Board has reviewed the application as supplemented and finds the necessary technical, financial, and managerial ability to provide local exchange service has been demonstrated. Talk America also filed a statement indicating that it will commit to utilizing thousands-block number pooling (TBNP), even in areas where TBNP is voluntary, to the extent it is technically feasible to do so.

Talk America seeks authority to provide competitive local exchange service throughout Iowa, but states that its initial service area will consist of the 58 exchanges identified in Talk America's application. Talk America states that it will adopt the incumbent carrier's exchange boundary maps for the 58 identified exchanges as they are currently filed and as they may be modified in the future. Iowa Code § 476.29(4) requires that each certificate define the service territory in which landline local telephone service will be provided and authorizes the Board to promulgate rules establishing the requirements for filing maps showing the service territory. Subrule 199 IAC 22.20(3) requires that all utilities have maps on file with the Board that show exchange boundaries. The Board finds that Talk America has complied with the statutory and rule requirements by concurring in the exchange maps of the incumbent local exchange carrier in Iowa.

Notice was provided to all affected carriers in the intended service territories that are entitled to notice pursuant to Iowa Code § 476.29(2) and no objections were received. Therefore, the Board will approve Talk America's application and issue a certificate of public convenience and necessity to Talk America concurrent with this order.

**IT IS THEREFORE ORDERED:**

1. The application for a certificate of public convenience and necessity filed by Talk America Services, LLC, on August 8, 2014, and supplemented on September 3, 2014, identified as Docket No. TF-2014-0005, is granted.

2. The concurrence in the maps and boundaries of the incumbent local exchange carriers in Iowa is approved.

3. A certificate, identified as Certificate No. 0367, is being issued to Talk America Services, LLC, concurrently with this order.

**UTILITIES BOARD**

/s/ Elizabeth S. Jacobs

/s/ Nick Wagner

ATTEST:

/s/ Joan Conrad  
Executive Secretary

/s/ Sheila K. Tipton

Dated at Des Moines, Iowa, this 7<sup>th</sup> day of October 2014.

# Exhibit F

(Financials removed in public filing)