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ARIZONA CORPORATION COMMISSION
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ORIGINAL

January 2, 2015

VIA CERTIFIED U.S. MAIL AND E-MAIL

Docket Control
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007-2927

**Re: Responses to Staff's Second Set of Data Requests to RCLEC, Inc.
Docket No. T-20912A-14-0300**

Dear Mr. Connolly,

RCLEC, Inc. hereby responds to Staff's Second Set of Data Requests in the attached responses. We are providing these responses by email to mconnolly@azcc.gov, and 1 original plus 13 copies to Docket Control at the address above.

Please contact us with any further questions.

Sincerely,

/s/ Inna Vinogradov

Enclosures

cc: Michael Patten, local counsel for RCLEC, Inc.
Anita Taff-Rice, counsel for RCLEC, Inc.

Arizona Corporation Commission
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STAFF'S SECOND SET OF DATA REQUESTS TO
RCLEC, INC. ("RCLEC")
DOCKET NO. T-20912A-14-0300

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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.

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

JURY COMMISSION
DOCKET CONTROL

Response: All answers are provided by legal representatives for RCLEC and Jeff Slater, Senior Director of Voice Gateways for RCLEC, 1400 Fashion Island Blvd., 7th Floor, San Mateo, CA 94404.

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

STF 2.1 In follow-up to STF 1.14, please provide the name of the cities in Virginia and California in which RCLEC's network operations centers are located. Also, please clarify the phrase "collocated with RingCentral facilities" and state whether the employees in these centers are employees of RCLEC or RingCentral.

RCLEC's network operations center is located in Denver, Colorado. RCLEC's super POPs (described in STF 2.4 below) are located in San Jose, California and Vienna, Virginia. RCLEC's switching equipment at the super POPs is collocated with RingCentral equipment at carrier hotels, meaning that RCLEC's equipment is in the same physical location and interconnected with equipment of RingCentral. Employees at these super POPs are employees of the facility housing RingCentral's and RCLEC's equipment.

STF 2.2 Please clarify for Staff if RCLEC will be providing maintenance and repair services for its customers. If so, how will these be provided for customers in Arizona? RCLEC's response to STF 1.26 indicates the company has no immediate plans that include Arizona-based employees. How will RCLEC effect maintenance and repair without them? Will customers be able to make maintenance and repair requests via the toll free number RCLEC provided in response to STF 1.16 (888-898-4591)?

RCLEC will not be providing maintenance and repair services for its customers.

STF 2.3 Please describe how the company will handle customer complaints. Please include any and all company contact information that a customer might use to register a complaint with RCLEC.

Customer complaints will be handled by Jeff Slater directly. The contact information is Jeff Slater, Senior Director of Voice Gateways for RCLEC, 1400 Fashion Island Blvd., 7th Floor, San Mateo, CA 94404. The email is jeff.slater@rlec.com.

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STF 2.4 In Exhibit F of the Application, RCLEC references "super POPs" located in Virginia and California. Please provide the name of the cities in Virginia and California in which RCLEC's "super POPs" are located.
Same as in response to SFT 2.1, RCLEC's network operations centers ("super POPs" – points of presence) are located in San Jose, California and Vienna, Virginia.

STF 2.5 In Exhibit F of the Application, RCLEC states it will be monitoring Arizona network service customers from a network operation center. Please indicate which NOC will provide this monitoring.

The monitoring will be provided from its San Mateo, CA Engineering Center and Denver, CO NOC.

STF 2.6 Please provide any updates to the list of states in which RCLEC has received Commission certifications, any denied applications, any applications that have been filed (see Exhibit A response to Question A-18) and states in which RCLEC is currently providing telecommunications services (response to Question A-19).

In addition to the states provided, RCLEC has filed an application in Maryland. RCLEC has not received any additional certifications, had any applications denied, or started providing service in any additional states.

STF 2.7 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.

RCLEC is a wholesale provider with no end user customers, meaning RCLEC's customers are other service providers. RCLEC's customers – providers with their own end users – do comply with 911 service requirements. Out of an abundance of caution, RCLEC has contracted with DASH/Bandwidth.com to provide third party 911 services should a 911 call somehow be routed to the RCLEC network.

A 911 call is defined as "any call initiated by an end user by dialing 911 for the purpose of accessing an emergency service provider." 47 CFR 64.3000(a). Since RCLEC does not have any end users, it is not possible to initiate a 911 call.

47 CFR 64.3001 states: "All telecommunications carriers shall transmit all 911 calls to a PSAP, to a designated statewide default answering point, or to an appropriate local emergency authority as set forth in § 64.3002." Since it is not possible to initiate 911 calls using RCLEC's service, the requirement of 47 CFR 64.3001 to transmit 911 calls to a PSAP or local emergency authority is not triggered.

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A.A.C. R14-2-1201(6) defines "basic local exchange telephone service," which includes "access to 1-party residential service with a voice grade line" A.C.C. R14-2-1201(6)(a). RCLEC does not provide residential service, and is not a basic local exchange telephone service provider.