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Arizona Corporation Commission

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

20741

Re: Docket Nos. T-02724A-14-0412, T-01051B-14-0412 and T-~~02741A~~-14-0412

Please find enclosed one original and thirteen copies of Table Top Telephone Company, Inc.'s response to Staff's First Set of Data Requests dated February 19, 2015.

Please contact me at 559-868-6322 or mjboos@ponderosatel.com with any questions regarding this response.

Sincerely

Matthew J. Boos
General Manager

Enclosure

600 North Second Avenue

Ajo, Arizona 85321

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Table Top Telephone Company, Inc.
Docket No. T-02724A-14-0412
Response to Staff Data Request 1

Response provided by: Matthew J. Boos
General Manager
PO Box 21
O'Neals, CA 93645
559-868-6322
mjboos@ponderosatel.com

STF 1.1 On Page 2, lines 7-8 of the Application, Table Top states it serves approximately 3,500 customers in its six Arizona exchanges. Please provide the following:

- a. The total number of business customers Table Top provides telecommunications services to as of December 31, 2014.
- b. The total number of residential customers Table Top provides telecommunications services to as of December 31, 2014.

Response a. 1,110 Business Customer Lines
b. 2,355 Residential Customer Lines

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STF 1.2 On Page 2, lines 11-19 of the Application, Table Top discusses how it has financed and completed networks upgrades and that its fiber optic lines traverse seven ranches and the United States Border Patrol office, each of which have requested telecommunications and broadband services from Table Top. Given that Table Top has facilities traversing each of the eight sites requested in this Application, will line extension charges be applicable to serve any the potential customers? If yes, please specify which customer(s) and why line extension charges are appropriate.

Response Table Top will not charge a line extension to the customers it plans to serve in its expanded territory requested within this Docket.

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STF 1.3 For each service area identified in Exhibits A – H, please specify the following for each Exhibit:

- a. The number of potential residential customers.
- b. The number of potential business customers.
- c. Please indicate the approximate distance from Table Top's existing facilities to each prospective service address.
- d. Will the Zone 2 monthly recurring rate applicable?
- e. Has Table Top communicated its proposed local calling area and rates to each prospective customer? If yes, please specify how this information was communicated to the prospective customers. If no, please explain why not.

Response Exhibit A, K4 Ranch:

- a. Five potential residential customers, including three requests for service.
- b. No potential business customers.
- c. 630 feet; an incremental 380 feet for two additional prospective addresses; 660'; 1,020 feet.

Exhibit B, Cienega Ranch:

- a. No potential residential customers.
- b. Two potential business customers, including two requests for service.
- c. 55 feet; an incremental 550 feet to the additional prospective address.

Exhibit C, Paddock Place:

- a. Two potential residential customers, including one request for service.
- b. No potential business customers.
- c. 211 feet; 51 feet.

Exhibit D, Strojost Ranch:

- a. One potential residential customer, including the request for service.
- b. No potential business customers.
- c. 446 feet.

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Exhibit E, Wagon Bow Ranch:

- a. Five potential residential customers, including two requests for service.
- b. No potential business customers.
- c. 3,270 feet; an incremental 6,815 feet to the additional prospective addresses.

Exhibit F, Wildhorse Ranch:

- a. Two potential residential customers, including two requests for service.
- b. No potential business customers.
- c. 331 feet; 1,587 feet.

Exhibit G, Yolo Ranch:

- a. Five potential residential customers.
- b. One potential business customer, including the request for service.
- c. 30 feet; an incremental 460 feet to the additional prospective addresses.

Exhibit H, Border Patrol:

- a. No potential residential customers.
- b. One potential business customer, including the request for service.
- c. 60 feet.

All Exhibits, A – H:

- d. Yes, Table Top plans to use the Zone 2 monthly recurring rate in all locations.
- e. Table Top Telephone has not formally communicated the proposed local calling area and rates to each prospective customer. While obtaining easements for the fiber-optic expansion project and upon the discovery that Table Top's fiber-optic facilities would be near their locations, we received many inquiries from the landowners about the delivery of communication services. As it was not our territory, we did not feel we could quote rates until it was determined that we could add these areas to our regulated service territory. At a minimum, we asked the landowners to submit an application near the completion of the project as a bona fide way to verify their interest and collect contact information. Our strategy was to proceed with the filing with the ACC to

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determine if these locations could be added to our regulated service territory before providing specific service information. We will communicate the local calling area and rates upon request by the ACC or at the time we receive approval to serve these locations.

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STF 1.4 In regards to the potential customers occupying the service area in Exhibit A:

- a. Has Table Top made prospective customers aware of differences in rates that may exist between Table Top, CenturyLink QC and/or Midvale Telephone Company, Inc.? If no, please explain why not.
- b. Please indicated the approximate distance from CenturyLink QC and/or Midvale Telephone Company, Inc., existing facilities, as applicable, to each prospective service address

Response

- a. Table Top has not made prospective customers aware of differences in rates that may exist between Table Top, CenturyLink QC and/or Midvale Telephone Company, Inc. (see response to STF 1.3 e. above). This would be purely an academic exercise because neither Century Link nor Midvale has the ability to serve the prospective customers at any rate (See response to STF 1.4.b, below).
- b. The approximate distance from CenturyLink QC existing facilities to the general location of all five service addresses is 14.9 miles. The approximate distance from Midvale Telephone Company, Inc. existing facilities to the general location of all five service addresses is contained within the letter from Midvale Telephone Company, Inc. that was included in the application, which is 15 miles.

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STF 1.4 (Note: There were two STF 1.4s.) Please describe with specificity, from each prospective customer's perspective located in Exhibit A, why it is advantageous to receive service from Table Top instead of from CenturyLink QC and/or Midvale Telephone Company, Inc. To the extent the Table Top is able, please include relative cost difference in the narrative.

Response It will be advantageous to receive service from Table Top instead of from CenturyLink QC because, in accordance with the CenturyLink QC letter that was included in the application, CenturyLink QC has no plans to serve this location (Section 20) in the immediate future. Likewise, it will be advantageous to receive service from Table Top instead of from Midvale Telephone Company, Inc. because, in accordance with the Midvale Telephone Company, Inc. letter that was included in the application, it would take considerable time to obtain the necessary federal land permits to build facilities. Furthermore, both companies support the transfer of their respective service areas in Exhibit A to Table Top. Table Top is unaware of the costs that CenturyLink QC and/or Midvale Telephone Company, Inc. would incur to build to the service locations in Exhibit A. However, the cost differences will likely be substantial since the distances for both CenturyLink QC and Midvale Telephone Company, Inc. are approximately 15 miles, while the distances from existing Table Top facilities are measured in feet, not miles.

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STF 1.5 Are there other prospective customers in the proposed transfer areas other than the ones described in the Application? If yes, have they been contacted by Table Top and what is their position in regards to the Company's Application?

Response Table Top believes it has identified all prospective customers in the proposed transfer areas.

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STF 1.6 Should Table Top's application be approved, how soon after a Commission Decision would the Company be able to provide service to the identified prospective customers?

Response Table Top believes it will be able to provide service to all of the current requests for service within 60 days. Requests for service received after a Commission Decision approving the transfer should be fulfilled within 30 days.

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STF 1.7 Has Table Top performed a survey of the requested CC&N extension area to determine how many occupied structures are within it? If yes, please identify by township, range and section where occupied structures are located. Please identify business and residential separately.

Response Yes, Table Top has identified all structures within the CC&N extension area, both occupied and non-occupied (see responses to 1.3 a. and b. above for all eight properties). The general locations of all structures are shown on the maps included with the application. The township, range and section for each of the eight properties is also included in the application. The thirteen requests for service (see responses to 1.3 a. and b. above) include nine residential customers and four business customers.

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STF 1.8 If the response to STF 1.7 above is in the negative, what is the basis for the Company selection of the geography it wishes to add to its certificated area? Please respond with specificity.

Response Not applicable.

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STF 1.9 Please identify, by township, range and section, any existing, or known to be planed, residential developments that are within the requested CC&N extension area.

Response Table Top is not aware of any existing or planned residential developments that are within the requested CC&N.

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STF 1.10 On Page 3, lines 25-27, under Requests for Service, of the written requests for service from potential customers, please provide by year:

- a. how many residential;
- b. how many business; and
- c. identify the township, range and section where the potential customers located within?

- Response
- a. Nine residential customers
 1. Exhibit D – one within T-16N, R-8W,S-36, received in 2013
 2. Exhibit E – two within T-17N, R-7W, S-35; both received in 2013
 3. Exhibit F – two within T-15N,R-8W, S-34, both received in 2013
 4. Exhibit A – two within T-18N, R-5W, S-20; one within T-18N , R-5W, S-21; all received in 2014
 5. Exhibit C – one within T-16N, R-6W, S-6, received in 2014
 - b. Four business customers
 1. Exhibit B – two within T-18N, R-6W, S-1, received in 2013
 2. Exhibit G – one within T-16N, R-7W, S-11, received in 2014
 3. Exhibit H – one within T-8S, R-6W, S-23, received in 2014

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STF 1.11 Has Table Top conducted any study or other analysis regarding customer growth within the requested CC&N extension area? If yes, please summarize the results of such studies or analysis. If no, why hasn't the company done so?

Response No. All potential customer locations have been identified and noted in response to STF 1.3 and the locations are noted on exhibits A to H within the application.

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STF 1.12 Should the Application be granted, does Table Top believe an adjustments to its rates would be necessary in order to serve the requested CC&N extension area? If yes, please explain.

Response No.

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STF 1.13 Please identify any FCC licenses, franchises or other such approvals the Applicants would need to acquire in order to provide service in the requested CC&N extension area. Also identify the anticipated time frames it would take to receive each of them.

Response Table Top believes the only outstanding approval is from the ACC, which we hope will be forthcoming shortly.

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STF 1.14 Is Table Top aware of any other service provider (ILEC, CLEC, cable company, etc.) delivering either voice or data services to any structure within the requested CC&N extension area? If yes, please identify the company, the types of services being delivered and within what sections.

Response No.

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STF 1.15 Beginning with 2016, please provide a five (5) year forecast of line growth for the proposed CC&N Extension area and identify those developments or geographic areas where the growth is forecast.

Response Table Top does not expect any developments within the proposed CC&N Extension area. Table Top did identify all potential customer locations (see response STF 1.3 a. and b.) including the thirteen applicants that have placed a service request. There are an additional eleven potential residential locations within the proposed CC&N Extension area (and within the seven ranch properties). Beyond the identified service locations, Table Top does not anticipate any future line growth based on conversations with the existing ranch owners.

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STF 1.16 Please describe the impact the growth identified in STF 1.15 above would have on the existing exchange switch and central office. For example, would a building addition be required, would the switch require replacement, would the existing switch, DC power plant or other equipment require major additions, etc.

Response There will be no impact on the existing exchange switch and central office from serving these additional service locations.

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STF 1.17 Please discuss Table Top's ability to effectively handle expansion into the proposed CC&N extension area while also continuing its existing construction and maintenance activities.

Response All eight properties in the proposed CC&N extension area are relatively close to Table Top's existing exchange boundaries, from about 4 to 24 miles, and many of these are along routes routinely traveled by Table Top operations staff. Table Top believes that these areas will be easily absorbed into its existing operations and will not adversely impact its existing construction and maintenance activities.