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BEFORE THE ARIZONA CORPORATI

**COMMISSIONERS**

SUSAN BITTER SMITH - Chairman  
BOB STUMP  
BOB BURNS  
DOUG LITTLE  
TOM FORESE

Arizona Corporation Commission

**DOCKETED**

OCT 08 2015

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IN THE MATTER OF THE APPLICATION OF  
WANRACK, LLC FOR A  
TELECOMMUNICATIONS CERTIFICATE OF  
CONVENIENCE AND NECESSITY TO  
PROVIDE PRIVATE LINE TRANSPORT  
SERVICES AND PETITION FOR  
COMPETITIVE CLASSIFICATION.

DOCKET NO. T-20925A-15-0113

**STAFF'S NOTICE OF FILING  
LATE-FILED EXHIBIT**

At the October 8, 2015, hearing in this matter, the Utilities Division ("Staff") of the Arizona Corporation Commission ("Commission") advised the Administrative Law Judge that Attachment 1 referenced in a footnote to the August 20, 2015 Staff Report had been inadvertently omitted from that document. Attachment 1 was offered and admitted into evidence as Staff's Exhibit S-2 at the hearing during which Staff agreed to file same as a late-filed exhibit. Attached hereto is the referenced Attachment 1.

RESPECTFULLY SUBMITTED this 8<sup>th</sup> day of October 2015.

*B. E. Smith*  
\_\_\_\_\_  
Brian E. Smith, Attorney  
Legal Division  
Arizona Corporation Commission  
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Original and thirteen (13) copies  
of the foregoing filed this  
8<sup>th</sup> day of October 2015 with:

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

AZ CORP COMMISSION  
DOCKET CONTROL

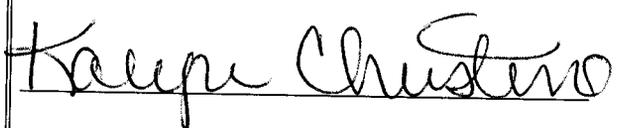
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2 this 8<sup>th</sup> day of October 2015 to:

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# **ATTACHMENT 1**

**STAFF'S FIRST SET OF DATA REQUESTS TO  
WANRACK, LLC ("WANRACK" or "COMPANY")  
DOCKET NO. T-20925A-15-0113  
MAY 7, 2015**

**STF 1.1**

Referencing the Company's application, Section A-1, the Company indicates it is seeking authority to provide Facilities-Based Private Line Service.

- a. Does the Company intend to provide Facilities-Based Private Line Services? If yes, does it intend to provide intraLATA private line service, interLATA private line service or both? If no, please explain.
- b. Does the Company intend to provide resold private line services?
- c. Will the Company provide private line services using another carrier, such as Qwest Corporation dba CenturyLink QC ("Qwest")? If so, please indicate the carrier(s) whose private line facilities will be used to provide private line services to customers.

**RESPONSE:**

- a) Yes, the Company will provide Facilities Based Private Line Services. We will initially provide intraLATA private line services but depending on customer growth, we will potentially provide interLATA service as well in the future.
- b) Not initially. See response in Section C below.
- c) Not initially. Our initial project in Arizona requires us to build a private fiber optic network to connect all the schools in the Yuma Elementary and Yuma Unified High School Districts. The service we are providing the School Districts is a Leased Lit service over a Private Fiber Network. The Company will own and operate this fiber optic network we are building in Yuma. As we grow our customer base and service offerings, we may resell facilities from Centurylink and other carriers. We will evaluate whether a leased, resold or company owned facility will provide the best solution for each of the new customers.

**RESPONDENT:**

Gerardo Garza  
Chief Executive Officer

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**STF 1.2**

Will the Company have any employees located in Arizona? If so, please indicate how many and provide a general description of each employee's job function. If not, please explain how it will provide facilities-based private line services to customers in Arizona.

**RESPONSE:**

Not initially. Services to our initial customer can be provided, maintained and operated with the use of contracted field technicians and repair crews in the case of an outage. We can also remotely monitor and troubleshoot our service through our NOC in Kansas City. All sales are managed through our national sales team located outside Arizona. We plan on growing our customer base in Yuma and Arizona in the future. As we add more customers, we intend on hiring local field maintenance and customer support personnel to ensure a high level of service and responsiveness to our customers.

**RESPONDENT:**

Gerardo Garza  
Chief Executive Officer

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DOCKET NO. T-20925A-15-0113  
MAY 7, 2015**

**STF 1.4**

Does the Company have a Network Operations Center ("NOC") or operate a call center where calls are taken from customers when they have concerns about their bills, service or complaints? If so, where is the NOC or call center located, what are its hours of operation and how many employees work at this location?

**RESPONSE:**

Yes. Our NOC is located in Kansas City, KS and it is operated by two full time employees. The NOC operates 24x7x365.

**RESPONDENT:**

Gerardo Garza  
Chief Executive Officer

**STAFF'S FIRST SET OF DATA REQUESTS TO  
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DOCKET NO. T-20925A-15-0113  
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**STF 1.5**

Regarding the provision of WANRack customer service for Arizona customers:

- a. Does the Company have a Network Operations Center ("NOC") or operate a call center where calls are taken from customers when they have concerns about their bills, service or complaints?
- b. Please provide the telephone number and the location of the Company's NOC or customer service call center(s) that will provide assistance to Arizona customers.
- c. Please provide the hours of operation and how many employees work at this location of the NOC or customer service call center(s).
- d. In the event of a service outage occurring during the Company's non-business hours of customer service center, whom would the customer contact should such an event occur? In your response, please be specific as to organization and the location of the organization that provides support for service outages to Arizona customers.

**RESPONSE:**

- a) Yes.
- b) The call center is located in Kansas City, KS. The customer service phone number is 1-855-482-7225.
- c) 24 hours a day, 7 days a week, 365 days a year with two employees. ....
- d) Customer can reach our customer support department through our NOC 24 hours a day. The customer support department is located in Kansas City.

**RESPONDENT:**

Gerardo Garza  
Chief Executive Officer