

Control Number: 36164



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SOAH DOCKET NO. 473-09-2277
PUC DOCKET NO. 36164

APPLICATION OF TRUE WIRELESS,
LLC FOR DESIGNATION AS AN
ELIGIBLE TELECOMMUNICATIONS
CARRIER AND ELIGIBLE
TELECOMMUNICATIONS PROVIDER

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BEFORE THE STATE OFFICE
OF
ADMINISTRATIVE HEARINGS

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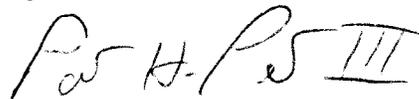
COMMISSION STAFF'S THIRD REQUEST FOR
INFORMATION TO TRUE WIRELESS, LLC
REQUEST NOS. 3-1 THROUGH 3-15

The Staff of the Public Utility Commission of Texas requests that True Wireless, LLC respond to the following requests for information in accordance with the Commission's Procedural Rules. Your response should be served on the attorney listed below no later than 7 days after you receive this request.

Respectfully Submitted,

Thomas S. Hunter
Division Director
Legal Division

Keith Rogas
Deputy Division Director
Legal Division



Patrick H. Peters III
Attorney-Legal Division
State Bar No. 24046622
(512) 936-7232
(512) 936-7268 (facsimile)
Public Utility Commission of Texas
1701 N. Congress Avenue
P.O. Box 13326
Austin, Texas 78711-3326

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on March 11, 2009 in accordance with P.U.C. Procedural Rule 22.74.

P. H. Peters III

Patrick H. Peters III

**COMMISSION STAFF'S THIRD REQUEST FOR
INFORMATION TO TRUE WIRELESS, LLC
REQUEST NOS. 3-1 THROUGH 3-15**

DEFINITIONS AND INSTRUCTIONS

1. "Commission" means the Public Utility Commission of Texas.
2. "Communication" means any disclosure, transfer, or exchange of information, whether oral or written.
3. "Commissioners" means any or all of the Commissioners of the Public Utility Commission of Texas.
4. "TRUE Wireless" means TRUE Wireless, LLC and any person acting or purporting to act on its behalf. The terms "you," "your" and "Company" may also be used to refer to TRUE Wireless.
5. "Concerning" means relating to, referring to, describing, concerning, evidencing, or constituting.
6. "Document" means any writing, email, drawing, graph, chart, photograph, sound recording, image, or data stored in any medium from which information can be obtained. A draft or non-identical copy is a separate document. If a responsive document has been destroyed or transferred beyond the Company's control, please describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the document.
7. "Identify" has the following meanings depending on the context:
 - (a) "Identify" when used with a natural person means to supply his or her name, last known residential and business addresses, and last known residential and business telephone numbers. If the above information is unavailable, provide some other means of identifying the person and his or her present location.

(b) “Identify” when used with an entity means to provide its name, manner of organization (*e.g.*, corporation, partnership, joint venture, etc.), address, and telephone number.

(c) “Identify” when used with a document means to provide its date, author, addressee, and the identity of the natural person known or believed by you to have possession, custody, or control of the document. If this information is unavailable, provide some other means of identifying the document and its present location with sufficient particularity to allow a party to this action to request its production under Procedural Rule 22.144.

(d) “Identify” when used with any other thing or matter means to provide a description with detail sufficient to allow a party to this action to identify it and determine its present location.

8. “Person” means any natural person, business, organization, legal entity, or governmental entity.

9. “Representative” means an officer, director, employee, agent, spokesperson, or attorney of a person.

10. “Staff” means the Staff of the Public Utility Commission of Texas.

11. The words “and” and “or” should be construed conjunctively or disjunctively as necessary to give each request its broadest scope.

12. The singular form of a word also refers to the plural, unless the context requires otherwise.

REQUESTS FOR INFORMATION

- 3-1. Please provide all documents, communications, tangible things, reports, models and data compilations that have been provided to, reviewed by or prepared by or for TRUE Wireless witness Pravin Kurishungal in anticipation of providing testimony in this matter.
- 3-2. Please provide all documents, communications, tangible things, reports, models and data compilations that have been provided to, reviewed by or prepared by or for TRUE Wireless witness Byron Young in anticipation of providing testimony in this matter.
- 3-3. Please separately provide the workpapers of each of TRUE Wireless's witnesses in this matter, and identify which witness is associated with each set of workpapers.
- 3-4. Please separately provide all drafts of testimony for each of TRUE Wireless's witnesses in this matter and identify the date that the draft was created and its author(s). For each draft, please also provide an electronic copy of the document or a printout that clearly identifies all redline changes and the commenter who authored each change.
- 3-5. Please provide all contracts or written agreements with Pravin Kurishungal to serve as a witness in this matter. Please provide copies of all invoices requesting payment for the services of Pravin Kurishungal and provide the number of hours worked on this case and amounts and dates for all related payments.
- 3-6. Byron Young contends that "a lease of facilities is deemed to constitute ownership of facilities for purposes of satisfying the criteria for designation as an Eligible Telecommunications Carrier and Eligible Telecommunications Provider." Direct Testimony of Byron Young at 2:6-8. Please identify all bases for this contention.
- 3-7. Provide a detailed explanation as to who owns the switch that True Wireless is leasing. In addition, provide the physical address as to where the switch is located, the CLLI code for that specific switch and the point codes for the switch.
- 3-8. Provide a list of all trunks going to/from that switch (including type of facility – i.e. PRI, DS1, DS3, OC3, etc.) and what type of traffic is being carried on each of those trunks, and to whom those trunks terminate/originate. Provide a copy of all ASRs for these trunks.
- 3-9. Provide detailed call flow diagrams that shows how a call originated by a True Wireless company: (a) terminates to an ILEC customer in the same wire center, (b) terminates to a customer outside the ILEC wire center in which the True Wireless customer originates the call but in the same LATA, and (c) terminates to another customer that has service with True Wireless's underlying carrier.
- 3-10. Provide detailed call flow diagrams for calls terminated to a True Wireless customer that originate from: (a) an ILEC customer in the same wire center, (b) from a customer that resides in a different wire center but in the same LATA; and (c) from a customer that has service with True Wireless's underlying carrier.

- 3-11. Provide the *specific* switch, model number, release version and manufacturer that is being leased by True Wireless from the company in 3-7 above.
- 3-12. Confirm or deny that True Wireless will be using the underlying carrier's NXX's for its customers. If you deny the statement, please explain in detail whose NXX's True Wireless will assign to its customers.
- 3-13. Provide a detailed description of who performs the local number portability function. If this is being performed by the True Wireless leased switch as described in 3-7 above, then provide a call flow diagram. Provide the LRN assigned to the leased switch in 3-7 above.
- 3-14. Provide all interconnection agreements with ILECs and CLECs for exchange of local traffic for the company that owns the switch in 3-7 above.
- 3-15. Confirm or deny that 100% of the calls placed by TRUE Wireless customers will be routed through the switch identified in 3-7 above. If you deny the statement, please explain each circumstance in which a call will not be routed through the switch identified in 3-7 above.