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IDAHO PUBLIC  
UTILITIES COMMISSION

14 September 2012

Ms. Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

*Hand Delivered*

ATT-T-12-01

RE: IN THE MATTER OF THE JOINT APPLICATION OF AT&T  
COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND AT&T  
CORP. TO AMEND CERTIFICATE OF PUBLIC CONVENIENCE AND  
NECESSITY NO. 295 TO REFLECT MERGER OF THE APPLICANTS

Dear Ms. Jewell:

Enclosed please find the above-referenced JOINT APPLICATION for filing on behalf of AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND AT&T CORP. We have enclosed an original and seven (7) copies, as well as an additional copy to be file-stamp for our records.

Very truly yours,

Molly O'Leary  
Richardson & O'Leary, PLLC

Encl.

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Attorneys for AT&T Communications  
of the Mountain States, Inc.  
and AT&T Corp.

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE JOINT  
APPLICATION OF AT&T  
COMMUNICATIONS OF THE MOUNTAIN  
STATES, INC. AND AT&T CORP. TO  
AMEND CERTIFICATE  
OF PUBLIC CONVENIENCE AND  
NECESSITY NO. 295 TO REFLECT  
MERGER OF THE APPLICANTS

CASE NO. ATT-T-12-01

JOINT APPLICATION TO AMEND  
CERTIFICATE OF PUBLIC  
CONVENIENCE AND NECESSITY  
No. 295

AT&T Communications of the Mountain States, Inc., (hereinafter "AT&T Comm.") and AT&T Corp. request that the Commission, pursuant to IDAPA 31.01.01, Rule 112, amend AT&T Comm.'s Certificate of Public Convenience and Necessity ["CPCN"] to reflect the merger of AT&T Comm. and its parent company, AT&T Corp. In support of this request AT&T Comm. and AT&T Corp. state:

PARTIES

1. AT&T Comm. is a wholly-owned direct subsidiary of AT&T Corp., which is a wholly-owned subsidiary of AT&T Inc. [formerly, SBC Communications Inc.] AT&T Comm. is

registered with the Secretary of State in Idaho<sup>1</sup> and is authorized as a provider of Title 62 telecommunications services, including basic exchange service within parts of the state of Idaho.<sup>2</sup>

2. AT&T Corp. is a New York corporation with headquarters at One AT&T Way, Bedminster, New Jersey 07921. AT&T Corp. is a subsidiary of AT&T Inc.<sup>3</sup> AT&T Corp., through its subsidiaries, is authorized to provide domestic and international telecommunications services throughout the United States. AT&T Corp. maintains a modern worldwide telecommunications network and, either directly or through its subsidiaries, offers wireline and Internet-based services and products serving residential, business, and government customers as well as wholesale customers.

3. AT&T Corp. is authorized to do business in Idaho. A copy of AT&T's Corp.'s certificate of authority to do business in Idaho is attached as Exhibit 3.<sup>4</sup>

#### MERGER SPECIFICS

4. AT&T Comm. and AT&T Corp. intend to merge for the purpose of consolidating the provision of intrastate regulated telecommunications services that are currently provided through multiple and duplicative state-specific entities. Exhibit 4, attached hereto, illustrates

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<sup>1</sup> AT&T Communications of the Mountain States, Inc., was registered to do business in Idaho with the Secretary of State on October 14, 1983, see Exhibit 1 attached.

<sup>2</sup> AT&T Communications of the Mountain States, Inc., was initially granted a CPCN to provide Intrastate InterLATA Telephone and Telecommunications Service in Idaho pursuant to a February 23, 1984, Order of the Idaho PUC transferring the Certificate of Authority of Mountain Bell and Pacific Northwest Bell in Idaho for the provision of Intrastate InterLATA service. [Order No. 18711] This certificate included authorization for AT&T Comm. to provide Title 61 services. Following the enactment of the Idaho Telecommunications Act of 1988, AT&T Comm. elected to remove its services from Title 61 regulation and instead be subject to the provisions of Title 62. AT&T Comm.'s Certificate of Authority was amended on August 26, 1996, to include the provision of Local Exchange Service. [Order No 26575; Amendment to Certificate No. 295]. See Exhibit 2 attached.

<sup>3</sup> AT&T Inc. is located at 208 S. Akard Street, Dallas, Texas 75202.

<sup>4</sup> AT&T Corp.'s current registered agent is: CT Corporation System, 1111 W. Jefferson, Suite 530, Boise, Idaho 83702.

the corporate structure of AT&T Corp. with regard to services in the State of Idaho before and after the merger.

5. This merger is part of an ongoing, nationwide effort of AT&T Inc., the parent of AT&T Corp., to simplify the corporate structure of its subsidiary companies. The merger will provide a more flexible corporate structure that will enable AT&T Corp. to more efficiently achieve potential operational, administrative, and strategic objective.

6. On a nationwide level, the consolidation is planned to be effective on or about October 31, 2012. On or about that date, in those states where the consolidation is planned to occur, the affected AT&T Corp. affiliates will be merged into AT&T Corp. In Idaho, AT&T Corp. is expected to assume the operations, assets, and customers of AT&T Comm. on or about October 31, 2012. For this reason, AT&T Comm. seeks to have its CPCN amended to reflect the merger with AT&T Corp. effective October 31, 2012.

7. The merger is entirely internal to AT&T Corp. As the corporate parent of AT&T Comm., AT&T Corp. will retain complete ownership of the assets, operations, and authorizations used to provide telecommunications services in the State of Idaho. AT&T Corp. is not seeking any additional authority than currently held by AT&T Comm.

8. The merger will be transparent to customers. There is no change in rates or substantive terms and conditions under which AT&T Corp., through AT&T Comm., currently serves customers, either under tariff or contract. Once the merger is completed, the same personnel who manage these services will continue to do so and there will be no change in the network assets used to provide these services.

9. The surviving entity, AT&T Corp. will make any required name changes to tariffs and contracts. AT&T Comm. has notified its customers, through bill messaging, that the

impending merger will not affect their rates and service. (See, Exhibit 5 for sample view of the customer messaging that began in early June 2012). Furthermore, all customer account information, including any PIC freezes that may have been implemented by a customer, will remain untouched.

10. In support of this Application, AT&T Corp. is providing the following information as required under Rule 112<sup>5</sup>:

- a. Exhibit 6 – A copy of AT&T Corp.'s articles of incorporation;
- b. Exhibit 7 – The names and addresses of the officers and directors of AT&T Corp.;
- c. Exhibit 8 – AT&T Corp.'s Certificate of Good Standing;
- d. Exhibit 9 – a copy of AT&T Inc.'s most recent audited balance sheet, income statement and statement of retained earnings<sup>6</sup>; and
- e. Exhibit 10 – Name, address and telephone number for those persons responsible for tariff and price list questions, as well as customer complaints and inquiries, and a toll-free telephone number for customer inquires and complaints.

AT&T Corp. represents that it has reviewed all of the Commission's rules and agrees to comply with them.

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<sup>5</sup> Consistent with Rule 112, AT&T Corp. is submitting only that information which is relevant to its request to amend its CPCN to reflect the merger with AT&T Comm. AT&T is also providing the relevant information required under Rule 114, Application for New Competitive Local Exchange Carrier.

<sup>6</sup> A complete version of AT&T Inc.'s most recent annual report is available at <http://www.att.com/gen/landing-pages?pid=5718>

CONCLUSION

11. As demonstrated above, this Application to Amend AT&T Comm.'s CPCN to reflect the merger between AT&T Comm. and AT&T Corp. is in accordance with the law, for a proper purpose, and consistent with the public interest. For these reasons, the Applicants respectfully request that the Commission expeditiously review this Application and transfer AT&T Comm.'s CPCN to AT&T Corp. effective October 31, 2012.

Respectfully submitted this 14<sup>th</sup> day of September, 2012.

By: \_\_\_\_\_

Molly O'Leary

For AT&T Communications of the Mountain States, Inc.  
and AT&T Corp.

**JOINT APPLICATION TO AMEND  
CERTIFICATE OF PUBLIC  
CONVENIENCE AND NECESSITY  
No. 295**

**Exhibit 1**

**AT&T Comm. of the Mountain States,  
Inc. Certificate of Authority to do  
Business in Idaho**

# State of Idaho

## Department of State.

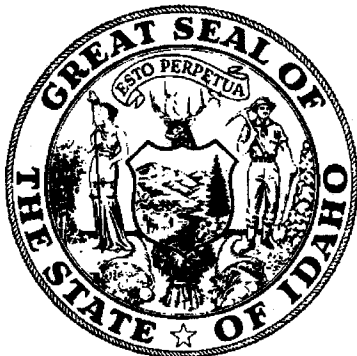
### CERTIFICATE OF AUTHORITY OF

AT&T COMMUNICATIONS OF MOUNTAIN STATES, INC.

I, PETE T. CENARRUSA, Secretary of State of the State of Idaho, hereby certify that duplicate originals of an Application of AT&T COMMUNICATIONS OF MOUNTAIN STATES, INC. for a Certificate of Authority to transact business in this State, duly signed and verified pursuant to the provisions of the Idaho Business Corporation Act, have been received in this office and are found to conform to law.

ACCORDINGLY and by virtue of the authority vested in me by law, I issue this Certificate of Authority to AT&T COMMUNICATIONS OF MOUNTAIN STATES, INC. to transact business in this State under the name AT&T COMMUNICATIONS OF MOUNTAIN STATES, INC. and attach hereto a duplicate original of the Application for such Certificate.

Dated October 14, 1983



*Pete T. Cenarrusa*

SECRETARY OF STATE

\_\_\_\_\_  
Corporation Clerk



## APPLICATION FOR CERTIFICATE OF AUTHORITY

To the Secretary of State of Idaho.

Pursuant to Section 30-1-110, Idaho Code, the undersigned Corporation hereby applies for a Certificate of Authority to transact business in your State, and for that purpose submits the following statement: Mont: 8 43

1. The name of the corporation is AT&T Communications of Mountain States, Inc.
2. \*The name which it shall use in Idaho is AT&T Communications of Mountain States, Inc.
3. It is incorporated under the laws of Colorado
4. The date of its incorporation is September 21, 1983 and the period of its duration is Perpetual
5. The address of its principal office in the state or country under the laws of which it is incorporated is AT&T Communications of the Mountain States, Inc. 1875 Lawrence, 15th Floor, Denver, Colorado 80202
6. The address to which correspondence should be addressed, if different from that in item 5 \_\_\_\_\_
7. The street address of its proposed registered office in Idaho is 300 North 6th Street  
Boise, Idaho 83701, and the name of its proposed registered agent in Idaho at that address is C T CORPORATION SYSTEM
8. The purpose or purposes which it proposes to pursue in the transaction of business in Idaho are:  
To provide interexchange telecommunications services.

9. The names and respective addresses of its directors and officers are:

Name	Office	Address
(See attached)		
_____	_____	_____
_____	_____	_____
_____	_____	_____

10. The aggregate number of shares which it has authority to issue, itemized by classes, par value of shares, and shares without par value, is:

Number of Shares	Class	Par Value Per Share or Statement That Shares Are Without Par Value
One	Common	Without par value
_____	_____	_____
_____	_____	_____

(continued on reverse)

11. The aggregate number of its issued shares, itemized by classes, par value of shares, and shares without par value, is:

Number of Shares	Class	Par Value Per Share or Statement That Shares Are Without Par Value
One	Common	Without par value

12. The corporation accepts and shall comply with the provisions of the Constitution and the laws of the State of Idaho.

13. This Application is accompanied by a copy of its articles of incorporation and amendments thereto, duly authenticated by the proper officer of the state or country under the laws of which it is incorporated.

Dated October 10, 19 83

AT&T Communications of Mountain States, Inc.

By Ronald T. SeMay

Its Vice President

and A. G. Walton  
A. G. Walton

Its Assistant- Secretary

STATE OF Missouri )

COUNTY OF Jackson ) ss:

I, Sandra K. Cadwell, a notary public, do hereby certify that on

this 10th day of October, 19 83, personally appeared before

me Ronald T. SeMay, who being by me first duly sworn, declared that he

is the Vice President of AT&T Communications of Mountain States, Inc.

that he signed the foregoing document as President of the corporation and that the statements therein contained are true.

SANDRA K. CADWELL

NOTARY PUBLIC STATE OF MISSOURI  
JACKSON CO.

MY COMMISSION EXPIRES MAR 1 1988

Sandra K. Cadwell  
Notary Public

\*Pursuant to section 30-1-108(b)(1), Idaho Code, if the corporation assumes a name other than its true name, this application must be accompanied by a resolution of the Board of Directors to that effect.

AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC.

OFFICERS

Mr. F. J. Wehmann, Jr.  
President  
795 Folsom Street  
Room 625  
San Francisco, CA 94107

Mr. R. E. Huber  
Vice President-Marketing  
795 Folsom Street  
6th Floor  
San Francisco, CA 94107

Mr. R. T. LeMay  
Vice President-External Affairs  
1100 Main Street  
14th Floor  
City Center Square  
Kansas City, MO 64105

Mr. N. R. Hichman  
Vice President-Regulatory Relations  
931 14th Street  
Denver, CO 80202

Mr. R. A. Rathka  
Treasurer  
340 Mt. Kemble Avenue  
Room N311  
Morristown, N.J. 07960

Mr. D. L. Steinmeyer  
Comptroller  
1314 Douglas Street  
Room 1300  
Omaha, NB 68102

Mr. M. J. Morris  
Vice President and General Counsel  
795 Folsom Street  
6th Floor  
San Francisco, CA 94107

Mr. T. O. Davis  
Secretary  
195 Broadway  
Room 2615  
New York, N.Y. 10007

Mr. A. G. Walton  
Assistant Secretary  
Room 3C166  
Bedminster, New Jersey 07921

Mr. A. J. Batson  
Assistant Secretary  
340 Mt. Kemble Avenue  
Room N311  
Morristown, N.J. 07960

Mr. C. J. Gustafson  
Assistant Secretary  
340 Mt. Kemble Avenue  
Room N227  
Morristown, N.J. 07960

DIRECTORS

Mr. M. Tanenbaum  
AT&T Communications, Inc.  
295 North Maple Avenue  
Room 4353L1  
Basking Ridge, New Jersey 07920

Mr. R. H. Gaynor  
AT&T Communications, Inc.  
Room 4B104  
Bedminster, New Jersey 07921

Mr. A. A. Green  
AT&T Communications, Inc.  
295 North Maple Avenue  
Room 432I3  
Basking Ridge, New Jersey 07920

Mr. J. E. Harrington  
AT&T Communications, Inc.  
295 North Maple Avenue  
Room 432I3  
Basking Ridge, New Jersey 07920

Mr. R. W. Kleinert  
AT&T Communications, Inc.  
Room 4B100  
Bedminster, New Jersey 07921

Mr. A. C. Partoll  
AT&T Communications  
295 North Maple Avenue  
Room 4349L1  
Basking Ridge, New Jersey 07920

Mr. S. R. Willcoxon  
AT&T Communications, Inc.  
295 North Maple Avenue  
Room 432K2  
Basking Ridge, New Jersey 07920

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STATE OF COLORADO

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ARTICLES OF INCORPORATION  
OF

SECRETARY OF  
STATE

AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC.  
UNDER THE COLORADO CORPORATION ACT

I, THE UNDERSIGNED, being a natural person of the age of eighteen years or more, acting as incorporator of a corporation under the Colorado Corporation Act, adopt the following Articles of Incorporation for such corporation:

- First. The name of the corporation is AT&T Communications of the Mountain States, Inc.
- Second. The period of its duration is perpetual.
- Third. The purposes for which the corporation is organized is to transact any or all lawful business for which corporations may be incorporated pursuant to the Colorado Corporation Code.
- Fourth. The aggregate number of shares of stock which the corporation shall have authority to issue is one (1) share without par value.
- Fifth. Cumulative voting of shares of stock is not authorized.

COMPUTER UPDATE COMPLETE  
AB

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Sixth. The address of the initial registered office of the Corporation in the State of Colorado is 1700 Broadway, Room 816, Denver, Colorado, 80290 and the name of its registered agent at such address is The Corporation Company. ✓

Seventh: The number of directors constituting the original board of directors of the corporation is seven, and the names and addresses of the persons who are to serve as directors until the first annual meeting of shareholders or until their successors are elected and qualify are:

M. Tanenbaum	295 North Maple Avenue, Basking Ridge, N.J. 07920
R. H. Gaynor	Rt. 202/206, Bedminster, N.J. 07921
A. A. Green	295 North Maple Avenue, Basking Ridge, N.J. 07920
J. E. Harrington	295 North Maple Avenue, Basking Ridge, N.J. 07920
R. W. Kleinert	Rt. 202/206, Bedminster, N.J. 07921
A. C. Partoll	295 North Maple Avenue, Basking Ridge, N.J. 07920
S. R. Willcoxon	295 North Maple Avenue, Basking Ridge, N.J. 07920

Eighth: The name and address of the incorporator is: R. Victor Bernstein, 195 Broadway, New York, N.Y. 10007

Dated September 16, 1983

  
\_\_\_\_\_  
R. Victor Bernstein






**JOINT APPLICATION TO AMEND  
CERTIFICATE OF PUBLIC  
CONVENIENCE AND NECESSITY  
No. 295**

**Exhibit 2**

**AT&T Comm. and AT&T Corp. Order  
Granting a CPCN to Provide Services  
in Idaho**

*copy to S. Kew*  
*as discussed*  
*Limited to GTE - US West*  
*similar*

Office of the Secretary  
 Service Date  
 August 27, 1996



**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION OF )  
 AT&T COMMUNICATIONS OF THE )  
 MOUNTAIN STATES FOR AN AMENDMENT )  
 TO ITS CERTIFICATE OF PUBLIC CONVE- )  
 NIENCE AND NECESSITY TO PROVIDE )  
 LOCAL EXCHANGE TELECOMMUNI- )  
 CATIONS SERVICES. )

CASE NO. ATT-T-96-1

ORDER NO. 26575

On February 29, 1996, AT&T Communications of the Mountain States, Inc. (AT&T) filed a Notice and Application for Amended Certificate of Public Convenience and Necessity requesting that its certificate be amended to authorize local exchange service in the state of Idaho. AT&T currently provides unregulated telecommunications services under *Idaho Code*, Title 62 and requests an amendment to its authority in order to provide Title 61 regulated telecommunications services, including basic exchange.<sup>1</sup>

On March 29, 1996, the Commission issued a Notice of Application, and on May 15, 1996 issued a Notice of Modified Procedure. The Notice of Modified Procedure provided a written comment period that expired on June 14, 1996. Comments were filed by a group of small independent telephone companies (Telcos), U S WEST Communications, Inc. (U S WEST), GTE of the Northwest, Inc. (GTE), Commission Staff and a private individual. The Commission on June 28, 1996, issued Order No. 26506 directing AT&T to respond in writing to the comments filed during the comment period. On July 12, 1996, AT&T filed responsive comments, and also filed a supplement to its application to provide specific information requested by Staff. By this Order the Commission approves the amendment of AT&T's Certificate of Public Convenience and Necessity to authorize the Company's provision of local exchange service within certain parts of the state.

<sup>1</sup>AT&T's certificate previously included authorization to provide Title 61 services. Following enactment of the Idaho Telecommunications Act of 1988, AT&T elected to remove its services from Title 61 regulation and instead be subject to the provisions of Title 62.

### THE COMMENTS

The Telcos are the companies that are in the process of completing purchases of rural exchanges from U S WEST. These companies state that they are "rural telephone companies" as defined by the federal Telecommunications Act of 1996, which provides them with a "right to heightened scrutiny by the Idaho Commission of requests to provide competitive telecommunications services in the rural telephone company's existing service area." These companies assert that if the Commission approves AT&T's Application, the Commission should not include the purchased exchange areas within the scope of its Order. The Telcos also remind the Commission that it retains a responsibility in state law to determine whether an applicant is ready, willing and able to immediately commence service to a certificated area.

The U S WEST comments, noting that AT&T's request is the first from any party seeking to provide competitive service in the previously fully regulated local exchange market, claim that it presents unique issues which require the Commission's consideration. U S WEST made the following points in its comments:

1. The Commission should impose the same regulatory requirements on both incumbent local exchange companies and new entrants for the provision of retail services to end users.
2. The Commission should understand exactly where new entrants intend to make services available and where the incumbent will continue to be the only providers. Thus, the Commission should require new entrants to provide a metes and bounds description or detailed map of the areas in which they will provide service within the next twelve months, a description of the classes of customers that will be served, whether the new entrant intends to construct or rely upon its own facilities, and an implementation schedule that defines a reasonable interval for the actual provision of service.
3. Noting that AT&T indicated it may build its own facilities, U S WEST identifies several issues, including AT&T's obligation to serve Title 61 and Title 62 customers in the certificated area, and AT&T's obligation to extend facilities to serve customers if no facilities are currently available from the incumbent.
4. It is not clear from AT&T's Application how it will perform the statutory obligations of a Title 61 provider. By Idaho law, providers of basic local exchange service must file tariffs, justify rates for service under traditional rate of return regulation, make an election to deregulate Title 62 services and utilize a cost allocation to determine the rates for Title 61 services.

5. The Commission should ensure that new entrants will be bound by the same regulations that create standards for the existing incumbents. Thus, the Commission should make compliance with all rules and regulations of the Commission a condition of certification. New entrants should be required to meet the same service quality standards, including recordkeeping and reporting requirements.

U S WEST recommended the Commission convene a hearing to consider these and other issues identified by U S WEST.

GTE stated in its comments that its primary concerns if AT&T's Application is approved relate to regulatory parity, rate rebalancing and universal support. By Idaho law, AT&T would need to make an election between Title 61 and Title 62 regulation. According to GTE, the appearance in its service territory of duplicate providers of local services calls into question traditional pricing of the Company's services under years of regulation by the Commission. Rates based on value of service criteria rather than underlining economic costs and market forces will need to be changed, according to GTE. Such changes will remove internal cross subsidies which now support the state's universal service objectives.

The Commission Staff in its comments stated that AT&T's Application should not present an occasion to examine all the issues presented by the federal Telecommunications Act, such as interconnection and number portability. These issues can be addressed in separate dockets as necessary once AT&T begins providing local exchange service. However, Staff stated that AT&T's map of its intended service area is not adequate in detail and that an improved map is required. In addition, AT&T did not file tariffs with its Application, which are necessary to determine the type of service the Company intends to offer and the scope of those services. According to Staff, AT&T should also be required to provide a full description of its proposed construction or expansion and the manner in which it intends to serve customers, that is, whether its services will be facilities based or by resale. Staff encouraged the Commission to approve AT&T's Application if AT&T revises its Application to include a detailed map of intended service area showing specific exchange areas, tariffs detailing the services the Company intends to offer, and a full description of its proposed construction or expansion and the manner in which it intends to serve customers.

In its reply comments, AT&T addressed specific issues raised in the previously filed comments of U S WEST, GTE, and the Telcos. Regarding U S WEST's comments, AT&T noted

that the certification process is not the appropriate venue to address many concerns regarding the Telecommunications Act. AT&T asserts the certification process addresses only three narrow questions, that is, (a) whether certification is in the public interest, (b) whether the Company has the technical and financial wherewithal to accomplish the expansion, and (c) how the expansion will be accomplished. Regarding details of its expansion into the local market, AT&T stated that the federal Act requires many of the issues to be resolved through negotiation with incumbent local exchange carriers, and then by mediation and arbitration if negotiation proves unsuccessful. AT&T states it is not possible to provide additional details regarding rates and services until that process is completed. AT&T stated that it will file interconnection and operational agreements as formulated and as approved, and will also file appropriate tariffs describing its proposed services when the services are actually offered.

AT&T agreed with GTE that issues regarding the effect of the Act on local exchange service should be decided by this Commission, but are not required to be resolved prior to AT&T's amendment to its Certificate.

In response to the comments of the Telcos, AT&T stated that it does not intend initially to serve areas served by local exchange carriers that are subject to the sale by U S WEST to the Telco purchasers. If the sales are consummated and AT&T seeks to serve the areas of the Telcos, AT&T stated it is aware of and will fully comply with Section 251's procedures relating to rural telephone companies.

In the supplemental information provided by AT&T, the Company provided a more detailed map, information regarding tariffs and services, and additional information on its plan to begin providing local exchange service. The new map more specifically depicts the service area where AT&T initially intends to offer service. AT&T reiterated that it intends to initially offer service only in those exchanges served by GTE and U S WEST. Regarding tariffs and specific services, AT&T stated it intends to offer a full array of local exchange services once all interconnection and operational arrangements are completed. AT&T provided a lengthy list of specific services it intends to provide. As to additional information about how AT&T intends to begin providing local service, AT&T states that it is not able to provide complete details until the necessary arrangements have been completed with the incumbent LECs. The Company intends to

