

Holsman, Laura

From: VanEschen, John
Sent: Wednesday, July 06, 2011 3:12 PM
To: Holsman, Laura
Subject: FW: Annual Report Deficiency for TelCove Operations, Inc. (BMAR-2011-1566)

From: Labbe, Andrew [mailto:Andrew.Labbe@Level3.com]
Sent: Wednesday, July 06, 2011 1:32 PM
To: VanEschen, John
Subject: RE: Annual Report Deficiency for TelCove Operations, Inc. (BMAR-2011-1566)

John,

We are in the process of amending our annual report for this entity in order to reflect appropriate line count data.

Additionally, the parent of TelCove is Level 3 Communications, LLC, and both entities share officers and directors in common. The list of O&D for Level 3 should suffice for TelCove's reporting requirement.

Finally, Level 3 filed its CPNI certification under separate heading with the State. This certification is intended to be for our entire company, which encompasses both Telcove and Broadwing.

Please let me know if you have any questions.

A. Andrew Labbe

Tax Manager - Regulatory Compliance

Level (3) Communications

1025 Eldorado Blvd., 41C-303

Broomfield, CO 80021

p: 720-888-3883

f: 720-888-5028

e: andrew.labbe@level3.com

From: VanEschen, John [mailto:john.vaneschen@psc.mo.gov]
Sent: Tuesday, July 05, 2011 9:51 AM
To: Labbe, Andrew
Cc: Holsman, Laura
Subject: Annual Report Deficiency for TelCove Operations, Inc. (BMAR-2011-1566)

This email is a deficiency notice for your annual report. Your annual report is considered deficient until the following issue(s) are addressed:

Item No. 4 on page 2 of your annual report fails to identify at least one general officer. *(An attachment to this company's annual report identifies a list of officers for a different company named "Level 3.")*

Please explain why the company is reporting 0 line quantities on page 5 but is reporting positive Missouri retail revenues (Row 1 Column A of the revenue table on page 3). If your annual report should have reported line quantities then please amend page 5 of your annual report accordingly.

Item No. 12 on page 7 of your company's annual report fails to properly address any requirements contained on the CPNI compliance page. *(A box has been checked indicating the information pertaining to CPNI has been separately filed; however, no record exists of this separate filing. Can you attach to your annual report filing?)*

Please resubmit your revised annual report in its entirety if your annual report needs to be revised

7/7/2011

to correct the deficiency. Any revised annual report/response must be filed within the Missouri Commission's Electronic Filing and Information System (EFIS) using the identification number previously supplied upon your initial annual report submission to the Commission.

Please be aware that per Commission rule 4 CSR 240-3.540(4) a company is required to respond within 20 days of being notified of a deficiency in a company's annual report. Failure to respond within 20 days may subject the company to a penalty of \$100 per day that it is late in filing a response to the deficiency.

John Van Eschen
Manager, Telecommunications Department
Missouri Public Service Commission
(573) 751-5525

Internal Use: [4](#), [8c](#), [12](#)