

Michael J. Wirl
Director
Public Affairs, Policy, and Communications



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Public Service Commission of Wisconsin
RECEIVED: 04/28/09, 8:00:20 AM

April 28, 2009

VIA PSC ELECTRONIC REGULATORY FILING SYSTEM

Mr. Gary Evenson
Administrator Telecommunications Division
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

RE: 2008 Annual Report (Utility No. 7039)

Dear Mr. Evenson,

Accompanying this letter, please find the public and confidential versions of the Reseller Annual Report for TTI National, Inc.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael J. Wirl".

Michael J. Wirl

**CONFIDENTIALITY FORM TO ACCOMPANY
REQUEST FOR CONFIDENTIAL FILING**



100 Communications Drive
P.O. Box 49
Sun Prairie, WI 53590-0049

1. **Date** April 28, 2009

2. **Position of any individual signing on behalf of an applicant.**

Michael Wirl – Director Public Affairs, Policy, and Communications

3. **Specific type of information for which confidential status is sought.**

Revenue Figures, Minutes of Use and Number of customers contained in the TTI National, Inc. (Utility ID 7039) Alternative Telecommunications Utility – Telecommunications Reseller Annual Report For Year Ending December 31, 2008. TTI National, Inc. is a wholly-owned subsidiary of Verizon.

4. **Facts supporting legal authority believed to constitute a basis for obtaining Confidential treatment of the information, including the specific statute or statutes relied upon:**

The circumstances warranting confidentiality are derived from Ch. 134.90 (trade secret protection) and 196.14 (public record exception). The Commission may withhold from public inspection any information, including trade secrets, which would aid a competitor of a public utility in competition with the public utility.

5. **Number of people having knowledge of the records sought to be protected from disclosure and whether the absence of confidential handling would increase that number significantly.**

Approximately 10 people have access to the information. Absence of confidential handling would significantly increase that number because this information is available only to employees who compile it and prepare reports incorporating it.

6. **Does the information have any value to the possessor or to a competitor and, if so, is that value substantial?**

Yes, the information has value to the possessor and to a competitor and the value is substantial. It would allow the competitor to create a strategic business plan for market entry targeted to certain services, exchange areas and customer groups. The Commission has recognized the value of this information by granting protection to the identical data in TTI National, Inc. annual reports in prior years.

7. **What damage, if any, would the possessor of the alleged confidential material suffer if there were disclosure and what specific advantages would a competitor reap from disclosure?**

If the information were disclosed it would have the ultimate damaging effect of TTI National's market share loss. It would allow a competitor to target its market entry and grow its market share at the expense of an equal loss of market share by TTI National.

Requiring TTI National, Inc. to disclose this information puts TTI National at a competitive disadvantage.

Disclosure would aid competitors' market planning and entry. The report information would strengthen the feasibility of business case, business plan scenarios, market strategies, tests of key assumptions and guide going forward operations.

Therefore, it would unfairly provide the vital information that would help determine which local markets competitors decide to enter.

8. **Are benefits likely to flow from disclosure; and if any, to whom would those benefits accrue?**

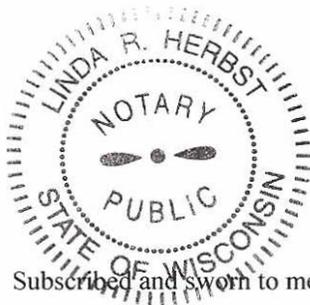
Disclosure of the information would allow benefits to accrue to competitors of TTI National, Inc.

9. **Would the public interest in disclosure be satisfied in any way other than by full disclosure?**

Not applicable, as there is not public "need" for disclosure.

10. **Why should the public not have access to the information even if the information is a trade secret or information would aid a competitor, or is otherwise subject to release or protection in the Commission's discretion.**

There is no benefit to the public associated with the disclosure of this information that would outweigh the competitive harm to TTI National, Inc.




Michael J. Wirl
Director Public Affairs, Policy, and Communications

Subscribed and sworn to me on this 28th day of April, 2009



Linda R. Herbst
My Commission expires on August 2, 2009

 4010	Public Service Commission of Wisconsin (7039) - TTI NATIONAL INC Alternative Telecommunications Utility -- Telecommunications Reseller Annual Report For Year Ending December 31, 2008
Rules for Reporting Assessable Revenue Definitions Help	

* - indicates required fields

Signature

I certify that I am the person responsible for accounts; that I have examined the following report and, to the best of my knowledge, information and belief, it is a correct statement of the business and affairs of said utility for the period covered by the report in respect to each and every matter set forth therein.

Utility Name: TTI NATIONAL INC

Person responsible for accounts: Haleh Davary *

Title of person responsible for accounts: Regulatory Compliance Analyst *

Date: 04/21/2009 * (mm/dd/yyyy)

Identification

Utility Name: TTI NATIONAL INC

Street Address: One Verizon Way *

PO Box: PO Box Zip:

City: Basking Ridge * State: NJ * Zip: 07920 *

Web Site Address: WWW.Verizon.Com

Business Customers Phone: 8004442222 Example 6085551212 Ext:

Residential Customers Phone: 8004443333 Example 6085551212 Ext:

Primary Address - Primary Utility Contact (located at Utility address)

Name: Michael J. Wirl *

Title: Director-Public Affairs, Policy & Communications *

Firm/Company: TTI National, Inc. *

Office Address: 100 Communications Drive *

PO Box: PO Box Zip:

City: Sun Prairie * State: WI * Zip: 53590 *

Fax Number: 6088371128 Example 6085551212

Phone Number: 6088371732 * Example 6085551212

Email Address: Mike.Wirl@Verizon.Com *

Annual Report Contact - Contact Person for Information Contained in This Annual Report

Same As Primary Address

Name: *

Title: *

Firm/Company: *

Office Address: *

PO Box: PO Box Zip:
 City: * State: * Zip: *
 Fax Number: Example 6085551212
 Phone Number: * Example 6085551212
 Email Address:

Regulatory Contact - Contact Person for Regulatory Inquiries and Complaints

Same As Primary Address

Name: *
 Title: *
 Firm/Company: *
 Office Address: *
 PO Box: PO Box Zip:
 City: * State: * Zip: *
 Fax Number: Example 6085551212
 Phone Number: * Example 6085551212
 Email Address:

Assessable Revenues (Reported in 000's, example: \$95,000 is reported as 95)

Calculation of Assessable Revenues for Remainder and Telephone Relay Assessment Purposes:

(000's)

1. Gross Operating Revenues--Wisconsin (including interstate revenues) **CONFIDENTIAL** *
2. **Less:** Inbound Interstate 800 and Collect Revenues billed to customer outside of Wisconsin and included on line 1 (exclusive of uncollectible and nonregulated revenues) **CONFIDENTIAL** *
3. **Less:** Current Year Write-offs of Uncollectible Revenues **CONFIDENTIAL** *
4. **Plus:** Current Year Collection of Operating Revenues Previously Written Off **CONFIDENTIAL** *
5. Total Assessable Revenues for Remainder and Telephone Relay Assessment Purposes **CONFIDENTIAL** *

Cost of plant in Wisconsin utilized by the reseller for provision of telecommunications services in Wisconsin:

6. Amount (in 000's) at December 31, 2008 **CONFIDENTIAL** *

Cost basis (including capital leases) of transmission facilities (excluding switches) in Wisconsin, including wire, cable, fiber optics or radio, and associated electronics owned, operated, managed or controlled by the telecommunications reseller, if in excess of \$400,000 (\$400 in 000's) as of December 31, 2008:

7. Amount (000's) at December 31, 2008 **CONFIDENTIAL** *

Assessable Revenues for Universal Service Fund Assessment Purposes (Line 10) and Total gross operating revenues, minutes of use and average number of customers generated by the provision of intrastate Wisconsin telecommunications services:

Revenue Type	Revenue Amount (000's)	Minutes of Use (Actual No.)	Avg. No. of Customers (Actual No.)
8. Retail (derived from telecommunications services sold directly to retail end-user customers)	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
9. Wholesale (derived from telecomm. services sold to other telecommunications providers)	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL
10. Total Wisconsin Gross Intrastate Operating Telecommunications Service Revenue	CONFIDENTIAL	CONFIDENTIAL	CONFIDENTIAL

Note: If Revenue Amount on line 10 divided by Minutes of Use on line 10 is more than 1, please provide a brief explanation.

Not Applicable

Changes During The Year

Changes during 2008 to the information requested in this report or other information originally filed with the reseller's certification petition:

If you do not have any, please enter NONE *

NONE

Adoption Of Other Marketing, Trade, or "doing business as" (DBA) Names:

Enter DBA name(s) one per line (press *Enter* to go to next line).

If you do not have any, please enter NONE *

NONE

Number of Lifeline and Linkup Customers

Actual number of Lifeline customers in Wisconsin at December 31, 2008

Actual number of Linkup customers in Wisconsin connected in 2008

CONFIDENTIAL *
CONFIDENTIAL *

Annual Report Notes (if applicable):

TTI's minutes of use are estimates generated by applying a ratio of revenue to minutes from 2007.
TTI National, Inc. is a subsidiary of Verizon Business Global LLC.

Explanation of Significant Variances in Assessable Revenue

If line 5 represents an increase or decrease of more than 20 percent and \$200,000 from last year, please provide a brief explanation here. If variance is less than these thresholds, enter NONE.

NONE

Please print this report before submitting it to the Commission. Once the report is submitted you will not be able to print it.

When the submit button is clicked, the program will check for errors and display a message to the right of any box with an error. If there are no errors, a confirmation page will appear.

Print

Check for Errors & Submit