

IN THE MATTER OF )  
)  
**SYNIVERSE TECHNOLOGIES, INC.** )  
)  
APPLICATION FOR CERTIFICATE OF AUTHORITY )  
TO OFFER COMPETITIVE TELECOMMUNICATIONS )  
SERVICES WITHIN THE STATE OF ILLINOIS )  
STATE OF ILLINOIS )

2007 NOV -8 1 A 9: 51

Docket No. CHIEF CLERK'S OFFICE

07-0546

**SYNIVERSE TECHNOLOGIES, INC. ("Applicant" or "SYNIVERSE")** pursuant to Ill. Rev. Statute Section 13-404 and Illinois Administrative Code Title 83, Part 710, hereby requests that it be granted a Certificate of Authority to offer competitive telecommunications services in the State of Illinois.

**GENERAL**

1. Applicant's Name:

SYNIVERSE TECHNOLOGIES, INC.  
8125 Highwoods Palm Way  
Tampa, Florida 33647  
TN: 813-637-5000  
FX: 813-637-5731  
Toll Free: 800-892-2888

Correspondence concerning this Application should be directed to:

David J. Robinson  
Manager – Regulatory Affairs  
SYNIVERSE Technologies, Inc.  
8125 Highwoods Palm Way  
Tampa, FL 33647  
TN: (813) 637-5940  
FX: (813) 637-5731

2. Authority Requested: (Mark all that apply)

- 13-403 Facilities Based Interexchange
- 13-404 Resale of Local and/or Interexchange (Private Line Services)
- 13-405 Facilities Based Local

3. Request for waivers/variances: In applications for local exchange service authority under Sections 13-404 or 13-405, waivers of Part 710 and of Section 735.180 of Part 735 are generally requested. In applications for interexchange service authority under Sections 13-403 and 13-404,

waivers of Part 710 and Part 735 are generally requested. Please indicate which waivers Applicant is requesting and explain why Applicant is requesting each waiver/variance.

Part 710 Uniform System of Accounts for Telecommunications Carriers

Part 735 Procedures Governing the Establishment of Credit, Billing, Deposits,  
Termination of Service and Issuance of Telephone Directories for Local Exchange  
Telecommunications Carriers in the State of Illinois

Section 735.180 Directories

Other

EXPLANATION:

Syniverse has reviewed 83 Illinois Administrative Code Part 735 and Section 735.180 and believes SYNIVERSE should be exempt from these provisions. SYNIVERSE respectfully requests a waiver from Part 735 and Part 735.180 of the Illinois Administrative Code because we only are only offering services to carriers the physical "phone number" will be associated with our carrier customers.

Granting this Application, with these exemptions, will further the public interest by expanding the availability of competitive carrier services including signaling services and resold private line transport services in the State of Illinois. The presence of Applicant in this market will increase incentives for other telecommunications providers to operate more efficiently, offer more innovative services, reduce their prices and improve their quality of service. SYNIVERSE believes our business plan is good for customers and the industry.

4. For all applicants requesting local exchange authority under Section 13-404 or Section 13-405, please complete the following:

- (a) the Standard Questions for Applicants Seeking Local Exchange Service Authority – Attached as **Appendix A** to this document
- (b) the 9-1-1 Questions for Applicants Seeking Local Exchange Service Authority – Attached as **Appendix B** to this document;

5. In what area of the state does the Applicant propose to provide service?

Statewide.

6. Please attach a sheet designating contact persons to work with Staff on the following:

- a) issues related to processing this application
- b) consumer issues
- c) customer complaint resolution
- d) technical and service quality issues
- e) "tariff" and pricing issues
- f) 9-1-1 issues
- g) security/law enforcement

Please identify each contact person's (i) name, (ii) title, (iii) mailing address, (iv) telephone number, (v) facsimile number, and (vi) e-mail address.

**Contact information for the above-referenced areas:**

David J. Robinson  
Manager – Public Policy  
Syniverse Technologies, Inc.  
8125 Highwoods Palm Way  
Tampa, FL 30005  
TN: (813) 637-5940  
FX: (813) 637-5731  
Em: david.robinson@syniverse.com

7. Please check type of organization?

- Individual  
 Corporation  
 Partnership  
 Other (Specify)

Date corporation was formed : 1987  
In what state? Delaware

8. Submit a copy of articles of incorporation and a copy of certificate of authority to transact business in Illinois.

A copy of Applicant's Articles of Incorporation is attached hereto as **Exhibit A**. Copy of Applicant's Certificate of Authority and Foreign Corporation License is attached as **Exhibit B**.

9. List jurisdictions in which Applicant is offering service(s).

SYNIVERSE is currently certificated as a IXC/reseller in Illinois; see Docket 03-0522. Syniverse is seeking authority to offer new services including numbering resources, resold switching, facilities-based signaling services with associated database services, while continuing to resell private line services.

10. Has the Applicant, or any principal in Applicant, been denied a Certificate of Service or had its certification revoked or suspended in any jurisdiction in this or another name?

YES (Please provide details)  NO

11. Have there been any complaints or judgments levied against the Applicant in any other jurisdiction?

YES  NO

If YES, describe fully. \_\_\_\_\_

12. Has Applicant provided service under any other name?

XX YES \_\_\_ NO

If YES, please list. TSI Telecommunication Networks Services, Inc. and Syniverse Networks, Inc.

13. Will the Applicant keep its books and records in Illinois? \_\_\_\_\_ YES XX NO

If NO, permission pursuant to 83 Ill. Adm Code Part 250 needs to be requested.

**APPLICANT'S REQUEST TO MAINTAIN OUT-OF-STATE LOCATION:**

Applicant will be a non-dominant carrier and requests to be regulated in the same manner as extended to other similarly situated non-dominant competitive local exchange carriers.

Pursuant to Title 83, Chapter 1, Part 250 of the Illinois Administrative Code, Applicant hereby respectfully requests that its books and records be kept in the State of Florida, however, Applicant will make such information available to the Commission as requested.

Applicant is fit, willing and able to properly perform the service proposed and will conform to the terms, conditions and rules adopted by the Commission.

**MANAGERIAL**

14. Please attach evidence of the applicant's managerial and technical resources and ability to provide service. This may be in narrative form, resumes of key personnel, or a combination of these forms.

Syniverse services and finances are outlined in our 10-K filing with the U.S. Securities Exchange Commission; pertinent sections are attached as EXHIBIT C.

15. List officers of Applicant.

A list of Officers and Directors for Syniverse Technologies, Inc. is attached as EXHIBIT D.

16. Does any officer of Applicant have an ownership or other interest in any other entity which has provided or is currently providing telecommunications services?

\_\_\_\_\_ YES XX NO

If YES, list entity. \_\_\_\_\_

17. How will Applicant bill for its service(s)? (At a minimum, describe how often the Applicant will bill for service and details of the billing statement.)

SYNIVERSE operates its own billing system. Payment for services shall be governed by applicable contracts and Commission requirements.

Mileage and service type will also be included to determine price.

A circuit price will be negotiated with our customers prior to ordering any service. An executed nondisclosure agreement (NDA) must be in place before SYNIVERSE can provide pricing for services.

Billing starts on the date the circuit is in service or "turned-up."

18. How does Applicant propose to handle service, billing, and repair complaints? (At a minimum, describe Applicant's internal process for complaint resolution, the complaint escalation process, the timeframe and process by which the customer is notified by Applicant that they may seek assistance from the Commission?)

SYNIVERSE operates a "hotline" service; it is operated 24 hours a day/7 days a week to answer customer questions or concerns. Our billing statements contain the hotline number (800-892-2888).

19. Will personnel be available at Applicant's business office during regular working hours to respond to inquiries about service or billing?

XX YES \_\_\_\_\_ NO

20. What telephone number(s) would a customer use to contact your company?

Service Hotline (24X7): 800-892-2888

Customer/Regulatory Contact: David Robinson  
813-637-5940 or email – [david.robinson@syniverse.com](mailto:david.robinson@syniverse.com)

21. Will Applicant abide by all Federal and State slamming and cramming laws pursuant to Section 13-902 of the Public Utilities Act and Section 258 of the 1996 Telecommunications Act?

XX YES \_\_\_\_\_ NO

22. Please describe applicant's procedures to prevent slamming and cramming of customers?

SYNIVERSE will obey Illinois law and abide by Commission requirements to protect customers from all illegal business practices including slamming or cramming.

23. If granted authority to operate as a local exchange carrier, will the applicant abide by the following 83 Illinois Administrative Code Parts: 705, 710, 720, 725, 730, 732, 735, 755, 756, 757, 770, and 772?

XX YES \_\_\_\_\_ NO (If no, please provide an explanation.)

Only as these requirements can be applied to the resale of private line services.

24. Is Applicant aware that it must file tariffs prior to providing service in Illinois?

XX YES \_\_\_\_\_ NO

SYNIVERSE seeks flexibility to negotiate contracts that outlines terms and conditions for our customers and we respectfully requests approval of this practice. However, SYNIVERSE will file a tariff and abide by the laws of the State of Illinois.

## FINANCIAL

24. Please attach evidence of Applicant's financial fitness through the submission of its most current income statement and balance sheet, or other appropriate documentation of applicant's financial resources and ability to provide service.

Applicant's Annual report as filed with the U.S. Securities Exchange Commission is attached hereto as EXHIBIT C.

## TECHNICAL

25. Does Applicant utilize its own equipment and/or facilities? XX YES \_\_\_ NO

If YES, please list the facilities Applicant intends to utilize. Also include evidence that Applicant possesses the necessary technical resources to deploy and maintain said facilities:

Syniverse currently owns and operates a signaling (SS7) network, we seek authority to offer local numbering resources and "foreign-exchange" type services in the local exchange. These are new services for Syniverse and requires Syniverse to seek competitive local exchange status.

If NO, which facility provider(s)'s services does the Applicant intend to use?

26. Please describe the nature of service to be provided (e.g., operator services, internet, debit cards, long distance service, data services, local service, prepaid local service).

Local numbering resources, "foreign-exchange" type services and competitive signaling services including associated call related databases. SYNIVERSE seeks to resell switching and continue to resell private line or "point-to-point" circuits in the following configurations:

DS-0 (single circuit) private line dedicated point-to-point circuit service for speeds of 56 Kbps or 64 Kbps

DS-1 (T1) services for speeds of 1.544 Mbps with to provide full-duplex digital transmission over a private line for high-capacity back office voice, data, and network infrastructure

DS-3 (T45) for speeds of 45 Mbps to provide, as with DS-1, full-duplex digital transmission over a private line for high-capacity back office voice, data, and network infrastructure

OC-12, which combines 3 DS-3 circuits; higher speeds available.

27. Will technical personnel be available at all times to assist customers with service problems?

XX YES \_\_\_\_\_ NO

28. If Applicant intends to provide payphone service, will the equipment utilized comply with FCC requirements and Finding (9) of the Commission Order entered in Docket No. 84-0442 on June 11, 1986, including, but not limited to: (a) touch dialing; (b) access to 9-1-1 and "0" operator dialing without use of a coin; (c) rules governing use of payphones by disabled persons; (d) ability to complete local and long-distance calls; (e) unlimited duration for local calls; and (f) a message explaining the telephone's general operations, dialing instructions for emergency assistance, payphone owner's name, method of reporting service problems and method of receiving credit for faulty calls?

\_\_\_\_\_ YES \_\_\_\_\_ NO XX Not Applicable (N/A)

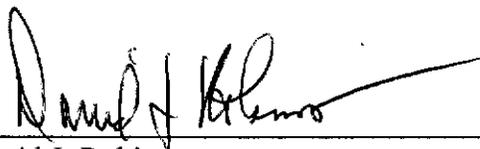
**CONCLUSION**

For the reasons set forth herein, SYNIVERSE TECHNOLOGIES, INC., respectfully submits that the Illinois Commerce Commission should find that the provision of competitive telecommunications services described herein will promote the public interest of the State, issue a Certificate to the effect, and grant all proper relief as may be necessary to enable Applicant to conduct such intrastate operations.

Respectfully submitted,

SYNIVERSE TECHNOLOGIES, INC.

By:



David J. Robinson  
Manager – Public Policy  
SYNIVERSE TECHNOLOGIES, INC.  
8125 Highwoods Palm Way  
Tampa, Florida 33647  
Telephone: (813) 637-5940

Dated: November 7, 2007

VERIFICATION OF APPLICANT

STATE OF FLORIDA )  
COUNTY OF Hillsborough )

I, DAVID Robinson, being first duly sworn, state that I am Manager-Public Policy of SYNIVERSE TECHNOLOGIES, INC. the Applicant herein; that I have reviewed the matters set forth in the Application and Exhibits and the statements contained therein are true to the of my knowledge, except as to those matters which are stated on information or belief, and as to those matters I believe them to be true.

SYNIVERSE TECHNOLOGIES, INC.

David Robinson

Sworn to and subscribed before me this 7<sup>th</sup> day of November, 2007.

My Commission Expires:

 **Terry A. Lundquist**  
Commission # DD302796  
Expires May 19, 2008  
Bonded Troy Fair - Insurance, Inc. 800-388-7019

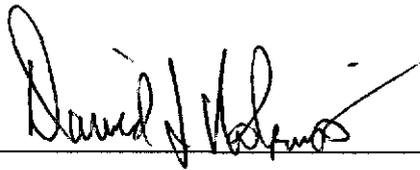
Terry A. Lundquist  
Notary Public

**CERTIFICATE OF SERVICE**

I, David Robinson, of SYNIVERSE TECHNOLOGIES, INC., 8125 Highwoods Palm Way, Tampa, FL 33647, do hereby certify that I caused to be served via FIRST CLASS U.S. mail true and correct copies of the foregoing APPLICATION FOR CERTIFICATE OF AUTHORITY TO OFFER COMPETITIVE TELECOMMUNICATIONS SERVICES WITHIN THE STATE OF ILLINOIS on:

Doug Price  
Illinois Commerce Commission  
527 East Capital Avenue  
Springfield, IL 62701

This 7<sup>th</sup> day of November, 2007.

  
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**List of Exhibits:**

- EXHIBIT A - Articles of Incorporation**
- EXHIBIT B - Illinois Certificate of Authority**
- EXHIBIT C - SYNIVERSE Annual Report**
- EXHIBIT D - SYNIVERSE Officers and Directors**