

**OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION**

ORIGINAL

Docket No. _____
ICC Office Use Only

TeleCommunication Systems, Inc. :
:
Amended Application for a certificate of :
local and interexchange authority :
to operate as a facilities based :
carrier of telecommunications :
services throughout the :
State of Illinois. :

Docket No. 09-0242

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**AMENDED APPLICATION FOR CERTIFICATE TO BECOME A
TELECOMMUNICATIONS CARRIER**

GENERAL

1. Applicant's Name(including d/b/a, if any) FEIN # 52-1526369

TeleCommunication Systems, Inc. ("TCS")

Address: Street 275 West Street

City Annapolis State/Zip Maryland 21401

2. Authority Requested: (Mark all that apply) -403 Facilities Based Interexchange
 13-404 Resale of Local and/or Interexchange
 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

Answer: See answer to question 1 of Appendix A.

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

Answer: See answer to question 1 of Appendix A.

Section 735.180 Directories

Answer: See answer to question 1 of Appendix A.

Other

Answer: See answer to question 1 of Appendix A.

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 found in Appendix A of this document
- (b) the 9-1-1 Questions for Applicants Seeking Local Exchange Service Authority found in Appendix B of this document;
- (c) the Financial Questions for Applicants Seeking Local Exchange Service Authority found in Appendix C of this document; and
- (d) if applicable, the Prepaid Service Questions for Applicants Seeking Local Exchange Service Authority found in Appendix D of this document.

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

Answer: Applicant proposes to make its services available on a wholesale basis to carriers throughout the state.

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

- a) issues related to processing this application

Kim Scovill
Senior Director, Government Affairs
275 West Street
Annapolis, MD 21401
Tel: (410) 349-7097
Fax: (410) 295-1884
E-mail: kscovill@telecomsys.com

- b) consumer issues

Richard H. Dickinson
Senior Director, Public Safety
2401 Elliott Avenue, 2nd Floor
Seattle, WA 98121
Tel: (206) 792-2224
Fax: (206) 792-2001
E-Mail: ddickinson@telecomsys.com

- c) customer complaint resolution

Richard H. Dickinson
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2401 Elliott Avenue, 2nd Floor
Seattle, WA 98121
Tel: (206) 792-2224
Fax: (206) 792-2001
E-Mail: ddickinson@telecomsys.com

- d) technical and service quality issues

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E-Mail: ddickinson@telecomsys.com

- e) "tariff" and pricing issues

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- f) 9-1-1 issues

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g) security/law enforcement

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E-Mail: ddickinson@telecomsys.com

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

7. Please check type of organization?

Individual Corporation
 Partnership Date corporation was formed July 30, 1987
 Other (Specify) In what state? Maryland

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

Answer: See Exhibit 1.

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

TeleCommunication Systems, Inc., ("TCS"), is presently certified in the states of WA, CA, FL, MN, TX, IA, and TN, but is not presently providing regulated services there. At the present time, TCS has applied for certification in several additional jurisdictions including MI, VA, MD, and UT.

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. NA

12. Has Applicant provided service under any other name?

YES NO

If YES, please list. NA

13. Will the Applicant keep its books and records in Illinois? YES NO
If NO, permission pursuant to 83 Ill. Adm Code Part 250 needs to be requested.

TCS requests permission to keep its books and records in MD.

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.

Answer: A short narrative response and biographies of the Applicant's principal officers and key technical staff are provided as Exhibit 2. The biographies include degrees, professional licenses, and experiences.

15. List officers of Applicant.

Maurice B. Tosé
Chairman of the Board, Chief Executive Officer, and President

Richard Young
Executive Vice President and Chief Operating Officer

Tom Brandt
Senior Vice President and Chief Financial Officer

Drew Morin
Senior Vice President and Chief Technical Officer

Timothy Lorello
Senior Vice President and Chief Marketing Officer

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 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.)

Answer: Customers are billed according to the terms of individually negotiated service contracts. Billing terms are case-specific and there is no standard billing cycle.

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?)

Answer: All complaints regarding billing will be handled directly through the account management team responsible for each particular wholesale customer in accordance with the terms of individually negotiated service contracts. The escalation and dispute resolution processes will be established by contract and will allow resolution through EDR if a billing dispute is not resolved voluntarily within a contractually determined amount of time. Also contained in the contract is notification of the customer's additional remedy of a complaint to the Commission.

19. Will personnel be available at Applicant's business office during regular working hours to respond to inquiries about service or billing? YES NO

20. What telephone number(s) would a customer use to contact your company? (800) 959-3749

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?

YES NO

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

Answer: The company does not intend to provide services or send bills to, collect money from, or otherwise contact the end-users of its wholesale customers. As such, these rules are not applicable to services that TCS will provide.

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?

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

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

YES NO

FINANCIAL

25. 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.

Answer: TCS is a publicly traded company that provides services to sophisticated carriers throughout the United States and internationally. TCS's 2008 SEC Form 10-K is attached as Exhibit 3 and is provided as evidence of the Applicant's financial fitness.

TECHNICAL

26. Does Applicant utilize its own equipment and/or facilities? 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:

Answer: TCS will utilize resources located at TCS's redundant and diverse facilities in Seattle, WA and Phoenix AZ. These resources consist of a Mobile Positioning Center (MPC) and a VoIP Positioning Center (VPC) (See Question 27 below for a description of these services)

The VPC provides E9-1-1 call routing information for VoIP carriers. Redundant data circuits will be provided by the carrier to the TCS VPC. Dedicated CAMA or SS7 voice circuits will be acquired by the carriers from their own switch to the local Illinois selective router. TCS will not own or operate voice circuits and will not transport the voice portion of a 911 call.

TCS's Infrastructure

TCS will utilize its existing network of redundant fault tolerant Data Centers in Seattle, WA and Phoenix, AZ to provide E911 call routing services throughout the country. Links to any ALI nodes or SRTGs in Illinois will be deployed in a diverse fault-tolerant fashion to ensure high availability for emergency calling. These links are used to monitor, manage and relay data between systems in Seattle or Phoenix and Illinois based systems. TCS currently employs high availability SUN based computing platforms in the Seattle and Phoenix facilities.

TCS utilizes HP OpenView as its standard network-monitoring tool. All data communications hardware (so equipped) and remote facility environments are capable of being monitored at TCS' Network Operations Center (NOC).

TCS facilities in Seattle and Phoenix are powered by Public Service utilities and are backed-up by generators and UPS systems. Telecommunications interconnectivity is provided by traditional local Telco copper facilities and two separate vendors' SONET fiber rings incorporating diverse building entrances.

The voice telephone system serving TCS' facilities are fully redundant in terms of internal common equipment, power, and serving facilities. TCS has disaster recovery plans to fallback to our Annapolis, MD facility for remote monitoring and operations. TCS also has a program in place to archive all key data on a daily basis in a secure offsite bonded facility.

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

27. 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).

Answer: TCS does not propose to provide traditional circuit switched telephone service or to sell any services to individual retail consumers. It is our intention to offer VPC services to VoIP Service providers.

As a VPC, TCS maintains a database of VoIP subscribers. When a VoIP subscriber dials 9-1-1, the VoIP Service Provider queries TCS with the customer phone number. TCS determines the appropriate PSAP destination for the call, based upon the subscriber's address in the TCS database. TCS responds with an Emergency Service Query Key (ESQK) that identifies the appropriate Illinois selective router and PSAP. ESQKs are routable non-dialable ten-digit numbers provisioned by TCS in the selective routers and ALI databases. When the ALI database is queried by the PSAP with the ESRK, the query is routed to TCS, which responds with the caller's location.

In accordance with current NENA standards, TCS manages our own pools of ESQKs, which are shared among our various customers (the VoIP service providers). TCS currently acquires our ESQKs in Illinois from the incumbent ILEC. The FCC has established an Interim Routing Number Authority (IRNA) to manage all ESQKs until some as yet undetermined date in the future. In order to qualify for ESQKs from the IRNA, the FCC requires all VPCs to be CLEC certified.

While TCS has access to pANI at this time, our access can be terminated at any instant if and when the FCC implements a Permanent Routing Number Authority (PRNA). Insofar as certification can be a time consuming process, and given the catastrophic impact upon TCS if the FCC were to implement the PRNA prior to our certification, it is urgent that certification be achieved sooner rather than later. Thus TCS seeks certification to meet the requirements of the FCC.

TCS provides a 24/7/365 Network Operations Center (NOC) accessible via a toll free number, (800) 959-3749. TCS is ISO 9001 certified and TL9000 certified. Sophisticated escalation matrices exist to ensure prompt resolution of outages. TCS will report applicable service outages to the FCC per established guidelines.

Due to the nature of TCS's technology, there may be no physical presence in the State of Illinois.

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

YES NO

29. 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? NA YES NA NO



(Signature of Applicant)

VERIFICATION

This application shall be verified under oath.

OATH

State of Maryland
County of Anne Arundel)ss

RICHARD DICKINSON makes oath and says that he is SR. DIRECTOR, PUBLIC SAFETY
(Insert here the name of affiant) (Insert the official title of the affiant)

of TeleCommunication Systems, Inc. (Insert here the exact legal title or name of the Applicant)

that he has examined the foregoing application and that to the best of his knowledge, information, and belief, all statements of fact contained in the said application are true, and the said application is a correct statement of the business and affairs of the above-named applicant in respect to each and every matter set forth therein.

RH Dickinso
(Signature of affiant)

Subscribed and sworn to before me, a Notary Public Tina L Myles
(Title of person authorized to administer oaths)

in the State and County above named, this 31st day of August, 2019



Tina L Myles
(Signature of person authorized to administer oath)
TINA L. MYLES
NOTARY PUBLIC
ANNE ARUNDEL COUNTY
MY COMMISSION EXPIRES 11-04-11