

BEFORE THE
ILLINOIS COMMERCE COMMISSION

Global Crossing Telecommunications, Inc.)
Application for a Certificate of Authority)
To Provide Facilities-Based)
Interexchange Telecommunications)
Services in the State of Illinois)

GLOBAL CROSSING TELECOMMUNICATIONS, INC.

TESTIMONY OF

DIANE PETERS
DIRECTOR, REGULATORY AFFAIRS – NORTH AMERICA

2010 APR 28 A 10:43
ILLINOIS
COMMERCE COMMISSION
CHIEF CLERK'S OFFICE

Q. Will you please state your name and business address.

A. My name is Diane Peters. My business address is 225 Kenneth Drive, Rochester, New York 14623. My telephone number is (585) 255-1425.

Q. By whom are you employed and in what capacity?

A. I am Director, Regulatory Affairs - North America of Global Crossing Telecommunications, Inc. ("GCTI" or "the Company"). In that capacity I have overall responsibility for regulatory compliance for GCTI and all other Global Crossing companies operating in North America.

Q. Please give a brief description of your background and experience.

A. I have been Director of Regulatory Affairs - North America at Global Crossing since 2004, and have been employed in the telecommunications industry for twenty years, with expertise in Marketing, Billing and Collections, Cost of Access/Network Cost Management, Provisioning, Network Optimization, and Regulatory.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to demonstrate that GCTI is technically, financially, and managerially capable of providing facilities-based long distance telecommunications services in Illinois.

Q. Is GCTI currently a certified telecommunications carrier in IL?

A. Yes. GCTI was granted long distance resale authority pursuant to Docket Nos. 84-0538 & 84-0539 issued March 3, 1986.

Q. Describe GCTI's experience in the telecommunications business.

GCTI was among the earliest competitive long distance providers following the divestiture of AT&T and has been active in Illinois for over twenty years, operating originally as Allnet Communication Services, Inc. GCTI is certified, registered, or otherwise authorized to provide long distance service nationwide.

Q. Please describe the services GCTI proposes to offer.

A. GCTI currently provides resold long distance services to business customers throughout the state of Illinois. Upon approval of this application, Applicant plans to provide the same services on a facilities-basis.

Q. Describe the proposed GCTI Illinois tariffs.

A. GCTI's approved tariff is on file with the Commission. No changes to its rates, terms or conditions of service are contemplated following approval of the request for facilities-based authority.

Q. Does GCTI own any network switches or transmission facilities used in routing calls?

A. Later this year GCTI plans to acquire Illinois switches and Indefeasible Rights of Use contracts via a merger with its affiliate, Global Crossing North American Networks, Inc. as part of an internal corporate reorganization. Ultimate ownership of these facilities rests with the parent company. All Global Crossing companies are managed by the same personnel. Applicant clearly has the in-house technical expertise and resources to maintain these facilities.

Q. How will GCTI bill for its services?

A. GCTI bills its services on a monthly basis. All billing statements list the Company's name, address and customer service toll free telephone number for inquiries or concerns. No change in billing practices is contemplated as a result of the proposed expanded authority.

Q. How will billing errors, complaints and trouble reports be handled?

A. GCTI understands the importance of effective customer service for its business customers. Most customers have individual account executives who handle all inquiries and other customer needs. The Company's toll free telephone number is also available for customer inquiries, complaints and repair.

Q. How will GCTI handle repairs for its service?

A. GCTI provides repair services using its own agents or through agents contracted with an independent third-party contractor.

Q. Does GCTI have a contact person that will work with the Illinois Consumer Services Division for customer complaint resolution?

A. Yes, I am the contact person for the Illinois Consumer Services Division. The telephone number is (585) 255-1425 and facsimile number is (877) 766-2492. We will update the Commission if this contact information changes.

Q. Is the Company aware of the area code splits and Ameritech's role as number administrator?

A. Yes.

Q. Describe GCTI's financial ability to operate as a telecommunications provider.

A. GCTI has sufficient financial resources to continue providing its current telecommunication services in Illinois and the financial capability to meet its lease and ownership obligations. Financial information was provided as Exhibit II to the Company's application.

Q. How will GCTI collect and remit appropriate taxes in Illinois?

A. The Company subscribes to the necessary tax programs and databases to track the current tax rate for all jurisdictions in which GCTI customers reside. The taxes collected by the Company are remitted to the correct taxing authorities. Our accounting system provides sufficiently detailed data for preparation of the Illinois Gross Receipts Tax returns.

Q. Has the company ever provided service under any other name?

A. Applicant was originally granted certification under the name Allnet Communication Services, Inc. It later changed its name to Frontier Communications Services, Inc. and finally to Global Crossing Telecommunications, Inc.

Q. Have any formal complaints or judgments been levied against the company?

A. No, the Company has not been involved in any formal customer complaints.

Q. How will Illinois consumers benefit from GCTI's services?

A. Certification of GCTI as a facilities-based provider of interexchange services will have no immediate impact on its customers. The planned internal corporate reorganization will reduce the cost and increase efficiencies that will ultimately accrue to the benefit of all GCTI's customers.

Q. Does this conclude your testimony?

A. Yes.

STATE OF NEW YORK
COUNTY OF MONROE

VERIFICATION

I, Diane L. Peters, hereby declare, under penalty of perjury, that I am Director, Regulatory Affairs - North America for Global Crossing Telecommunications, Inc. and Global Crossing North American Networks, Inc.; that I am authorized to make this verification on behalf of both named companies; that I have read the foregoing testimony; and that the facts stated therein are true and correct to the best of my knowledge, information and belief.

Diane L. Peters

Diane L. Peters
Director, Regulatory Affairs - North America
Global Crossing Telecommunications, Inc.
Global Crossing North American Networks, Inc.

Sworn to and subscribed before me this 26th day of April, 2010.

Jeanne Chabot

Notary Public

My Commission expires:

JEANNE CHABOT
Notary Public, State of New York ·
No. 01CH6034835
Qualified in Ontario County
Commission Expires December 20, 2013