

BEFORE THE
ILLINOIS COMMERCE COMMISSION

Communications Venture Corporation :
d/b/a INdigital telecom :

Application for a Certificate of : Docket No.
Authority to operate as a 9-1-1 System :
Provider in the State of Illinois :

PETITION

I. GENERAL INFORMATION

- A. Applicant's Name (including d/b/a, if any) Fein# 35-1957521

Communications Venture Corporation d/b/a INdigital telecom
5312 West Washington Center Road
Fort Wayne, IN 46818
- B. Type of organization: Corporation
Date Corporation formed: 6/16/1995
State Corporation formed in: Indiana
- C. Please attach a sheet designating a contact person's (i) name, (ii) title, (iii) mailing address, (iv) telephone number, (v) facsimile number, and (vi) e-mail address to work with Staff regarding each of the following:
1. Issues related to processing this petition
 2. 9-1-1 Customer issues and Customer complaint resolution
 3. Technical and service quality issues
 4. Tariff and pricing issues
 5. Security/law enforcement

Please see Exhibit 1.

II. PUBLIC SAFETY REQUIREMENTS TO ENSURE SAFE, CONTINUOUS AND UNINTERRUPTED 9-1-1 SERVICE

- A. PUA Section 13-900 requires that an applicant for 9-1-1 System Provider authority must demonstrate that service will be provided in a safe, continuous, and uninterrupted manner. Providing 9-1-1 services must be considered a top priority due to the

nature of such a service offering. In accordance with this requirement, provide each of the following:

1. A detailed plan for migrating 9-1-1 service offerings from the current 9-1-1 System Provider to the Applicant which will ensure a smooth transition with no disruption of 9-1-1 services.

Please see Exhibit 2.

2. A detailed exit plan in case Applicant must cease operating and will not be able to fulfill its obligations as a 9-1-1 System Provider for its 9-1-1 customer(s).

Please see Exhibit 3.

- B. Please affirm that Applicant as a 9-1-1 System Provider will ensure that 9-1-1 is handled in accordance with the 83 Illinois Administrative Code Parts 720, 725, 726, 727, 728, the Emergency Telephone System Act (50 ILCS Act 750), the Emergency Wireless Safety Act (50 ILCS Act 751) and any future rules or reporting requirements the Commission may adopt for 9-1-1 System Providers.

Applicant so affirms.

- C. Please affirm that Applicant will comply with and abide by all applicable standards and procedures contained in the 83 Illinois Administrative Code.

Applicant so affirms.

- D. Will applicant seek any waivers or variances of any Commission rules or regulations in this proceeding? If so, provide all supporting evidence and documentation concerning the public interest served by a grant of any such waiver or variance.

Applicant seeks a waiver of Part 250 of Title 83 of the Illinois Administrative Code – Public Utility Books and Accounts (maintaining books and records out of state). Applicant maintains its books and records in Fort Wayne, Indiana at its corporate offices. Applicant will provide the Commission and/or Staff within the State of Illinois access to its books and records upon request.

Applicant also seeks a waiver of Part 710 Uniform System of Accounts for Telecommunications Carriers. Applicant will utilize a System of Accounts in conformity with Generally Accepted Accounting Principles (“GAAP”) consistent with the principles embodied in the provision of the Uniform System of Accounts (“USOA”). As a non-dominant carrier, INdigital telecom is not required to maintain its accounts in the Uniform System of Accounts by the Federal Communications Commission. Applicant will maintain its records in sufficient detail to facilitate the calculation of all applicable taxes and surcharges. Applicants accounting system provides sufficiently detailed data

for the preparation of Illinois Gross Receipts Tax returns. Applicant will provide annual financial statements when required or requested subsequent to granting of the waiver to the Commission. Applicant understands that the requested waiver of Part 710 will not excuse if rom compliance with future Commission rules or amendments to Part 710 otherwise applicable to the Company.

- E. Provide a notarized affidavit affirming that Applicant will abide by all applicable 83 Illinois Administrative Codes and that Applicant will abide by provisions of the Emergency Telephone System Act and the Wireless Emergency Telecommunications Safety Act.

Please see Exhibit 4.

- F. Affirm that applicant will provide to the Commission and/or to 9-1-1 Program Staff (on a confidential basis, if appropriate) full and complete copies of all 9-1-1 System Provider contracts signed with 9-1-1 systems in the State of Illinois within 3 weeks of such signature.

Applicant so affirms.

III. MANAGERIAL RESOURCES, CAPABILITIES AND CORPORATE STRUCTURE

- A. Provide a complete description and documentation detailing the applicant's corporate structure and ownership.

There are ten independent telephone companies that are shareholders in Communications Venture Corporation, the corporate parent company of INdigital telecom (INdigital). These companies are located in Indiana, Ohio, and Michigan. INdigital is headquartered in Fort Wayne, Indiana, and remains privately held. The shareholder companies are New Paris Telephone, Fort Jennings Telephone, Springport Telephone, Kalida Telephone, Bloomington Telephone, Ottoville Telephone, Craigville Telephone, Allendale Telephone, Citizens Telephone, and Pulaski/White Telephone.

- B. Provide copies of articles of incorporation and certificate of authority to transact business in Illinois.

See Exhibit 5

- C. List all names, addresses and contact email and phone numbers of officers and directors, or partners.

The following are the officers of INdigital telecom and may be contacted at the Company's home office which is located at: 5312 W. Washington Center Road, Fort Wayne, IN 46818. Main Telephone #: 260-469-2010 Fax: 877-469-4329

Mark Grady President
Email: mgrady@indigital.net
Ofc: 260-469-2133

Jon Whirledge Chief Financial Officer
Email: jwhirledge@indigital.net
Ofc: 260-469-2502

Brent Cummings Chief Operations Officer
Email: bcummings@indigital.net
Ofc: 260-469-2118

- D. Provide any and all copies of any state Public Utility Commission (or other regulatory authority) Order or other document granting certificate (or other authority) to operate as a 9-1-1 System Provider.

Applicant has been granted authority by the Public Utility Commission of Ohio (PUCO) to provide Competitive Emergency Telecommunications Services in the State of Ohio. Please see Exhibit 6 for a copy of the Ohio order.

Applicant is also certified as a CLEC in Indiana, Michigan, Kentucky, and Illinois.

- E. List every jurisdiction where the applicant or affiliate is certified to provide 9-1-1 services.

Applicant is certified to provide 9-1-1 services in all jurisdictions in the state of Indiana, Ohio, Michigan, and Kentucky.

- F. Has the applicant or any affiliate provided 9-1-1 service(s) in any jurisdiction? Describe fully the nature and type of such services. Provide detailed network diagrams and copies of all applicable tariffs associated with each such service.

Applicant is the sole provider of the Indiana IP based Wireless E9-1-1 network also known as the IN911 network. This network provides wireless 9-1-1 services and delivers 9-1-1 wireless calls to all authorized jurisdictions within the state of Indiana. 9-1-1 Service is deregulated in Indiana, therefore, there are no applicable tariffs for this service. Please see Exhibit 7 for diagrams illustrating the configuration used in Indiana. Applicant also provides Wireline E9-1-1 services to over 20 countywide jurisdictions in Indiana.

- G. Describe in detail the experience applicant has which would enable it to successfully operate as a 9-1-1 system provider in Illinois.

Applicant has been providing 9-1-1 services including selective routing, database and Customer Premise Equipment since 2005. Applicant has implemented a statewide IP based 9-1-1 network and has delivered over 12 million 9-1-1 calls over the IP based

network to Indiana PSAPS. Applicant has successfully transitioned live wireless and wireline 9-1-1 calls from other 9-1-1 Service Providers to applicant's 9-1-1 network. Key individuals within INdigital have over 87 combined years of experience in the telecommunications industry and 40 years of combined experience as a 9-1-1 Service Provider. Applicant offers a broad and robust suite of 9-1-1 products and services that are currently not offered by any other 9-1-1 Service Provider in the State of Illinois.

- H. Does Applicant or any principal in Applicant, currently (or previously) hold any type of certificate from the Illinois Commerce Commission? Does any officer of Applicant have an ownership or other interest in any other entity which has provided or is currently providing telecommunications services in Illinois or any other state? If so, please explain and provide the name of the telecommunications carrier.

Applicant holds a Certificate of Interexchange Service Authority to provide resold local and facilities-based telecommunications services within the State of Illinois pursuant to an Order in Docket 11-0777, dated February 23, 2012. There are ten independent telephone companies that are shareholders in Communications Venture Corporation, the corporate parent company of INdigital. These companies are located in Indiana, Ohio, and Michigan and offer telecommunications services in those states. INdigital is headquartered in Fort Wayne, Indiana, and remains privately held. The shareholder companies are New Paris Telephone, Fort Jennings Telephone, Springport Telephone, Kalida Telephone, Bloomington Telephone, Ottoville Telephone, Craigville Telephone, Allendale Telephone, Citizens Telephone, and Pulaski/White Telephone. Mark Grady, President of INdigital telecom, works as General Manager of New Paris Telephone.

- I. Has the Applicant, or any principal in Applicant, been denied a Certificate of Service Authority or had its certification revoked or suspended in any jurisdiction (in this or another name)? If so, provide all pertinent details, including but not limited to: the jurisdiction in which such revocation or suspension occurred: the date(s) of any such revocation: the basis for such suspension or revocation: and if a suspension, any conditions associate with such suspension.

Applicant has not been denied a Certificate of Service Authority or had its certification revoked or suspended in any jurisdiction.

- J. Has Applicant, or any principal in Applicant, ever voluntarily withdrawn a certification in any jurisdiction? If so, please provide all pertinent details, including but not limited to: the jurisdiction in which the certificate was withdrawn; the date of such withdrawal; and the reason for withdrawal.

Applicant has not withdrawn a certificate in any jurisdiction.

- K. Has Applicant or any affiliate provided any 9-1-1 network or database routing services under any other name? IF so, state such name, the jurisdiction(s) in which applicant or its affiliate(s) provided service, and fully describe all such services provided.

Applicant has not provided 9-1-1 network or database routing services under any other name.

- L. Is Applicant currently (or in the past) been involved in any legal or regulatory disputes (instate, out-of-state, or at the FCC)? If so, provide all pertinent details. If so, have any judgments been levied against the company (Please explain and provide a copy of such order)?

Applicant was involved in the following regulatory cases:

Indiana Utility Regulatory Commission (IURC) cause numbers:

43499 – INdigital – ATT – final order issued February 2010

43277 – INdigital – VZ - resolved by arbitrated settlement agreement

42715 – INdigital – Sprint – resolved by arbitrated settlement agreement

Kentucky Public Service Commission Case Number:

Case No. 2009-00438 – INdigital – ATT Kentucky – interconnection order approved October 2010.

Civil Action No. 3:10-cv-00075-DCR AT&T vs. Kentucky PSC and Communications Venture Corp. Case withdrawn by AT&T.

- M. Please affirm that applicant will remit appropriate PUF fees applicable for all Commission regulated 911 related services.

Applicant affirms the company will remit appropriate PUF fees applicable for all Commission regulated 911 related services.

- N. For all officers, directors, partners and key technical personnel, provide resumes or curricula vitae containing detailed histories of all experience with provisioning of 9-1-1 system provider or related services.

See Exhibit 8.

- O. Does applicant agree to maintain a 24 hour 7 days a week emergency contact number available to your customers as well as Commission Staff? Describe and explain such availability.

Applicant currently maintains a 24x7x365 emergency contact number (877-469-2010) for our customers and will offer that same service in Illinois. This number is also available to Commission Staff.

- P. Please provide the number of people applicant currently employs, (a) based in Illinois; and (b) in total. Provide projections or estimations of how many employees will be located in Illinois, and what their anticipated duties will be. If Applicant does not anticipate having employees based in Illinois, please explain how Illinois 9-1-1 systems will receive prompt technical support?

Applicant currently has one employee who is based in Illinois and approximately 40 employees in total. Applicant will add technical support staff based upon the location and needs of customers. Applicant will ensure that maintenance and support services are available and meet all statutory and customer contractual requirements.

- Q. Please state the method(s) by which Applicant intends to solicit 9-1-1 system customers if certified as a 9-1-1 system provider in Illinois?

Applicant intends to solicit customers by partnering with existing 9-1-1 Service Providers in Illinois, and in some cases by contacting 9-1-1 system customers directly.

- R. Attach a copy of a proposed tariff(s) to this petition detailing 9-1-1 system provider services Applicant intends to provide. Proposed tariffs should comply with Sections 9-102 and 9-102.1 of the Public Utilities Act (PUA). Note that any future modifications to Commission approved tariffs must comply with all applicable provisions of Section 9-201 of the PUA.

See Exhibit 9.

IV. FINANCIAL RESOURCES, CAPABILITIES AND VIABILITY

- A. Provide a complete summary of applicant's current financial condition, liquidity, and capital resources. Describe sources of funds available to support the applicant's operations that are the subject of this certification application.

Applicant has been operating since 1995. Applicant is a Corporation and its shareholders are 10 other independent telephone companies who are located in Indiana, Michigan and Ohio. Applicant currently operates two diverse business segments, a CLEC (Competitive Local Exchange Carrier) and as a 9-1-1 System Service Provider. Applicant maintains a mix of commercial and residential customers throughout Indiana and the greater Midwest.

Applicant maintains a simple financial structure and straightforward books. The financial position of the company is strong. Applicant's Balance Sheet and Statement of Income, attached as Exhibit 10, demonstrate profitability in 2011. The 2010 period reflected decreased profits due to a significant bad debt write down in Access Revenues. Bad debt write downs in future periods are not expected.

Applicant maintains a strong and growing cash position. Receivables are a consistent asset. A significant portion of the receivables are related to contracts with State and Local Government entities for 9-1-1 services. The remainder is contracts with businesses for CLEC services. Collection of receivables is timely and highly probable.

Applicant's current cash position and access to lines of credit position it well to finance both its current and ongoing business and its future expansion projects. Applicant is capable of adding staff to acquire new technological expertise and expanding its management talent pool as needed to continue to provide an exceptional level of service quality.

- B. Provide Applicant's most current audited financial statements including balance sheet, income statement, cash flow statement, and other appropriate documentation of financial resources that enable the ability to provide services.

Please see Exhibit 10 (Public). Exhibit 10 (Proprietary) is being made available to Staff and will be submitted into the record after an appropriate proprietary order is entered. Applicant does not have audited financial statements. Applicant has included its current compiled financial statements.

- C. If the Applicant is a newly-formed company, provide financial statements, a business plan, and an executive summary which describes the source of funding that will support its operations.

Applicant has been in business since 1995.

- D. IF the financial statement provided is of a consolidated nature, provide descriptions of the relationships between all parties/affiliates included in it. The relationships can be documented in narrative form or in flow chart format.

Not applicable.

- E. Will the Applicant follow the prescribed accounting requirements under IL Administrative Code 710 for Uniform System of Accounts ("USOA") or will it choose to maintain its records in accordance with Generally Accepted Accounting Principles ("GAAP").

Applicant maintains its records in accordance with Generally Accepted Accounting Principles ("GAAP").

- F. Please state whether the accounting system currently in use by Applicant provides sufficiently detailed data for the preparation of Illinois Gross Receipts Tax returns. Please identify the specific accounts or sub-accounts that provide this data.

The accounting system currently in use by Applicant provides sufficiently detailed data for the preparation of Illinois Gross Receipts Tax returns.

Applicant will create sub accounts 1..XXXX.13 for all accounts 1..5000. through 1..5999.

- G. Will the Applicant provide annual audited statements for all periods subsequent to receipt of certification to operate as a 9-1-1 system provider?

Applicant does not have audited financial statements, but will provide compiled financial statements for all periods subsequent to receipt of certification.

- H. Please attach a copy of Applicant's chart of accounts.

Please see Exhibit 11 (Public). Exhibit 11 (Proprietary) is being made available to Staff and will be submitted into the record after an appropriate proprietary order is entered.

- I. Will Applicant maintain all its books and records in Illinois? If no, Applicant must request permission to do so pursuant to 83 IL Administrative Code Part 250.

Applicant seeks a waiver of Part 250 of Title 83 of the Illinois Administrative Code – Public Utility Books and Accounts (maintaining books and records out of state). Applicant maintains its books and records in Fort Wayne, Indiana at its corporate offices. Applicant will provide the Commission and/or Staff within the State of Illinois access to its books and records upon request.

VI. TECHNICAL AND NETWORK RESOURCES AND CAPABILITIES

- A. Provide a complete and detailed description (including all pertinent technical specifications) of network facilities Applicant intends to utilize to provide 9-1-1 services, IP-based services, or a combinations of both.

Applicant is currently a 9-1-1 Service Provider in the state of Indiana and delivers wireless, wireline, and VoIP 9-1-1 calls via a statewide IP network to PSAPS within the state. Applicant is also a wireless, wireline, and VoIP 9-1-1 database provider in the state of Indiana. Legacy (tabular or static) database records are stored and maintained in a geo-diverse service platform. Wireless and VoIP 9-1-1 database queries are sent to TCS or Intrado via the industry standard E2+ protocol. Applicant intends to provide E9-1-1, database, and next generation 9-1-1 services to existing IL 9-1-1 Service Providers, and/or to authorized 9-1-1 Systems in Illinois.

Applicant currently does not own or operate its own facilities in Illinois and intends to utilize leased facilities from local transport providers, until the market dictates that applicant install company owned facilities. Applicant will initially lease network and central office facilities from local cable, ILEC, CLEC, and last mile fiber providers to deliver services to the 9-1-1 System or 9-1-1 Service Provider.

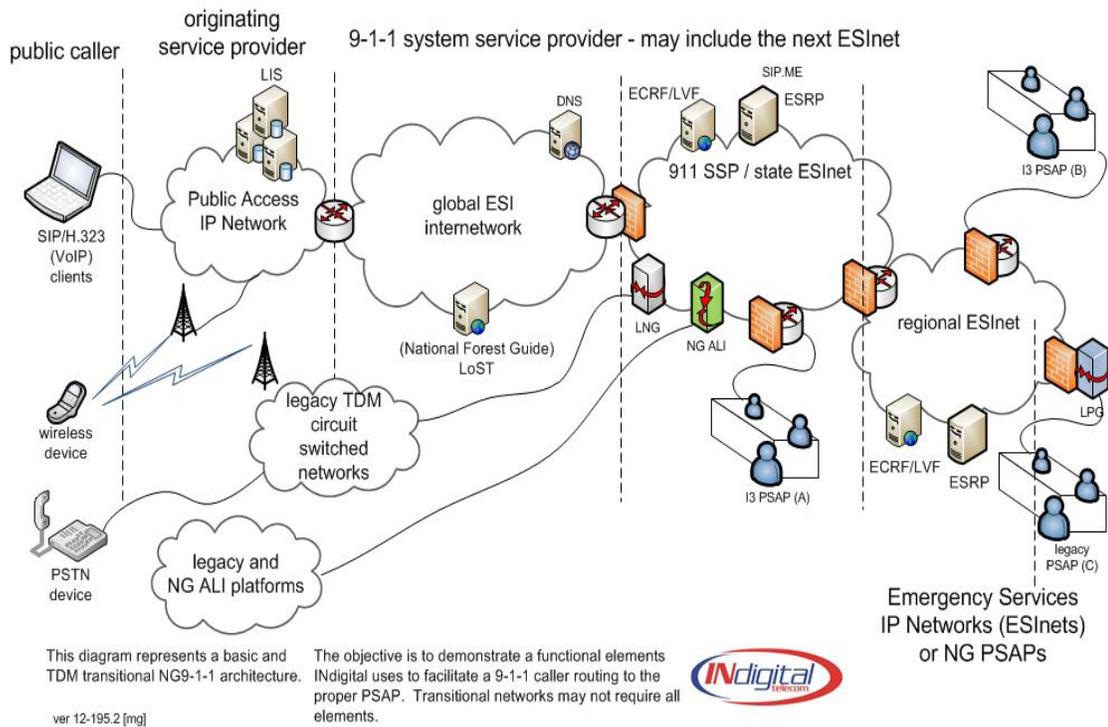
- B. Please explain in detail whether Applicant will provide traditional telephony-based 9-1-1 services, IP-based 9-1-1 services, or a combination of both.

Applicant will provide both IP based and traditional legacy 9-1-1 services. Applicant will not require carriers to make significant changes in their networks to interconnect. Applicant utilizes a variety of industry standard Legacy Network Gateways (LNG) that provide interconnection via CAMA, T1, PRI, and SS7. The LNG then converts calls to SIP for further routing by the applicant's network to the appropriate 9-1-1 System or other 9-1-1 Service Provider(s).

Applicant has created a voice and non-voice emergency call SIP routing engine. The platform product name is SIP.ME (Session Initiated Protocol & Messaging Engine). SIP.ME provides the functional equivalent of traditional selective routing in a legacy environment, and ESRP/ECRF functions in a Next Generation 9-1-1 environment. The functional equivalent of legacy Selective Routing is known as ESRP (Emergency Service

Routing Proxy) and ECRF (Emergency Communication Routing Function). These functions are shown in the block diagram below.

All traditional E9-1-1 technology remains the same in the originating service provider network (OSP), however, OSP's that desire to move to Next Generation service have that option available.



C. If Applicant proposes to provide IP based 9-1-1 system provider services, please respond in detail to the following:

1. Fully describe all safeguards integrated into the infrastructure (on both the system provider and the customer ends) to protect against viruses and cyber exploits and attacks.

Applicant utilizes private IP connections, not public internet connections as a primary delivery system for services. IP connections are terminated on routers that provide firewall and demarcation to the next network element, typically a connection to PSAP equipment. In this configuration, PSAP customer premise equipment is isolated, prohibiting cyber exploits and other attacks. Only permitted protocols can transverse the IP firewall.

2. Fully describe the security of IP network on the PSAP end, including password protection and access, etc.

The ESInet (Emergency Services IP Network) IP network is the applicant's private network. Non 9-1-1 applications and other PSAP business applications would utilize separate IP connections (either physically or virtual connections) within the ESInet. This design effectively limits the exposure to problems that would be introduced by a common public network connection.

3. Fully describe applicant's recovery and restoration plan in the event of service interruptions and/or outages.

Service interruptions and/or outages are limited by the mesh network design and the self, re-routing (self-healing) nature of the IP network. Applicant utilizes redundant geo-diverse SIP/ME routing engines, redundant and diverse database servers, and redundant leased facilities from multiple providers.

Applicant has established internal procedures for handling any and all types of service interruptions and/or outages. Applicant monitors its network 24x7. If an outage is detected or reported, technicians are dispatched and a conference bridge is established to troubleshoot and resolve the issue. PSAPs are notified of the trouble and also given a bridge number to dial in to if they prefer to monitor the status of the trouble directly. All PSAPs are notified upon restoration.

Applicant will provide a 9-1-1 disaster recovery plan for each 9-1-1 System. This will include procedures for reporting and escalating any outages or system failures if not previously detected and notified by the applicant.

Applicant can also provide alternate routing to a backup PSAP or failover routing for the PSAP if alternate routing to the backup PSAP is impacted by the nature of the outage. Failover routing means that in the event of a 9-1-1 network outage, calls can be re-routed using the Public Switched Telephone Network (PSTN) to multiple types of delivery points. PSTN fail safe points can be administrative lines or cellular devices.

4. Fully describe the Internet Protocol standards applicant will employ.

Applicant fully endorses and complies with the work of NENA, IETF, TIA, ATIS, and CSRIC, and adheres to all applicable industry standards. While protocols vary as time passes and the industry progresses, the applicant is an active participant in many industry associations, and is continuously working within the industry to develop new standards and best practices. The applicant will adopt and deploy new standards or protocols as developed by the industry and/or the marketplace. Currently, the most predominate high level IP protocols utilized in emerging NG9-1-1 technology are SIP, XMPP, and XML. Applicant is capable and will utilize any of these protocols as warranted by the customer's application or configuration needs.

5. Fully describe all emergency power safeguards (e.g., generators, batteries, load and capacity testing) integral to applicant's 9-1-1 infrastructure to support continuous and uninterrupted 9-1-1 service.

Applicant uses DC power systems and generators where financially and technically practical. At minimum, applicant uses AC power systems with battery backed uninterruptable power supplies and backup generators. All backup systems include network surveillance to ensure they will operate as intended.

- D. Identify the locations of Applicant's gateways, switching equipment or selective routers.

Applicant's SIP:ME platform is fully modular, and supports gateways or switching nodes in any location where the ESInet can be established. Applicant intends to install a trunking gateway(s) in a LEC central office facility in Illinois. This may be in a vendor/partnership arrangement with a Local Exchange Carrier (LEC) and/or 9-1-1 Service Provider, or in a co-location arrangement. Applicant may partner with a 9-1-1 Service Provider to upgrade their existing 9-1-1 Selective Routers with Applicant's SIP:ME platform technology to deliver 9-1-1 calls using SIP trunks to the 9-1-1 System. Applicant's ESRP selective router processing elements are currently located and will be deployed if necessary from Indianapolis, Fort Wayne, or New Paris, Indiana until the Illinois market warrants duplicating the equipment in Illinois. As opportunities develop in the Illinois market, additional equipment will be installed locally.

- E. Describe the redundancy and diversity of Applicant's system architecture.

The applicant's service design is geo-diverse, for all routers, database stores, central office gateways, active processing elements and PSAP gateways. Facilities to the PSAP are generally provided over redundant leased IP connections, ensuring survivability.

- F. Pursuant to the IL Administrative Code Part 725.400(j), an Illinois 9-1-1 system provider must be facilities-based. Provide a detailed description of any facilities the applicant proposes to (or potentially may) lease or otherwise obtain from third parties.

Please refer to answer D. above in reference to Applicant's network and switching elements. Applicant will lease DS3's, DS1's, fiber facilities and IP connections from certified carriers as dictated by the customer's configuration requirements.

- G. IL Administrative Code Part 725.500(c) (2) requires that any change to existing 9-1-1 trunking methods must be evaluated and approved by the Commission's 9-1-1 Program prior to implementation. Please affirm that Applicant will provide (in conjunction with pertinent 9-1-1 systems and on a confidential basis, if appropriate), all material reasonably requested by the Commission's 9-1-1 Program Manager to enable such evaluation.

Applicant is not proposing significant changes to the existing 9-1-1 trunking methods established by the current 9-1-1 system service providers. Interconnection with the legacy originating service provider will be via traditional methods such as SS7, T1, and CAMA. Additionally, the applicant will provide any information sought by the Commission in the review of its trunking methods.

- H. Provide all available evidence to support Applicant's contention that it possesses the requisite technical resources and capabilities to deploy and maintain all facilities and equipment detailed in this application.

Applicant is currently the wireless 911 service provider for the state of Indiana and has processed and delivered over 13 million 9-1-1 calls to PSAPs throughout the state using multiple types of IP protocols and emerging technologies. Applicant is a certified Competitive Emergency Services Telecommunications Carrier in the State of Ohio, and a certified competitive local exchange carrier in Michigan, and Kentucky. In addition to this, Applicant is the wireline 9-1-1 Service Provider to over 20 counties in the State of Indiana, including providing legacy ALI database services. Applicant also provides and maintains NG911 customer premise equipment (CPE).

Applicant's network in Indiana interfaces with 13 wireless providers, 4 major ILECs, and 132 primary PSAPs in the state. Applicant has established interoperability with multiple local exchange carriers and many 911 service providers operating in the Midwest.

- I. Fully describe Applicant's proposed processes for the required coordination with incumbent LECs, CLECs, Wireless providers, VoIP providers, and local 9-1-1 system managements.

The applicant has significant and extensive experience in providing stand-alone, integrated, and 'blended' 9-1-1 service from legacy providers in a tightly coordinated 9-1-1 service environment. Typically, these services are provided via a number of different business rules and network configurations.

Service transitions, augmentation and enhancements typically involve industry standard practices, which involve interconnection negotiation (as required), project identification and planning, forecasting, preparation and submission of access service requests, wholesale agreements and letters of agency from the local authority issued to the originating service providers.

Applicant hosts regular project management meetings and conference calls with all impacted carriers and impacted parties for each project. The network configuration is designed, and communicated to each carrier. Network orders are issued and completed and tested with each impacted carrier. Transition of the 9-1-1 database, including TN loads, updates, and error resolution, are coordinated with the appropriate service providers and carriers during each project call. Call through testing is performed. Methods of Procedures (MOPs) are issued to each impacted carrier outlining all details and procedures prior to each cutover. Conference bridges are established and the network is cutover and tested with each carrier. Call through testing is performed again to ensure all capabilities of the PSAP are working properly.

In addition to implementing and coordinating the Indiana statewide wireless E9-1-1 network, Applicant has successfully coordinated the implementation and transition of 20 countywide wireline E9-1-1 Systems to its network and is in the process of transitioning others.

- J. Does the applicant commit to facilitate and cooperate in inspections (by personnel of the Commission's Telecom Engineering Department) of all 9-1-1 system network facilities deployed to provide Illinois 9-1-1 services?

Applicant commits to facilitate and cooperate in inspections of all 9-1-1 system network facilities deployed to provide 9-1-1 services in IL with the Commission's Telecom Engineering Department.

- K. Describe in detail the manner in which Applicant will support Private Business Switch/Centrex, VoIP, and wireless services.

Applicant provides PS/ALI services in locations where it is the 9-1-1 service provider. PS/ALI database service is provided by a web based platform that simplifies database updates for private switch users. Users of the system can make updates at any time. Changes are then compared to the Master Street Addressing Guide (MSAG) and other key geospatial data. Once a PS/ALI record is deemed validated, it is inserted in the live ALI database. This process takes less than 24 hours, and has a provision for interim records to be inserted in real time.

- L. Describe in detail the manner in which Applicant will create the 9-1-1 database for a specific 9-1-1 system.

9-1-1 System management provides the Applicant with a copy of the MSAG or geospatial data representing the service area of the jurisdiction. The Applicant requests TN loads from and establishes update processes with all carriers that operate within the jurisdiction, including meeting and working with any PS ALI subscribers. The data is validated against the MSAG and loaded in the Applicant's 9-1-1 ALI database system. Applicant has established E2 connections to third party database providers and loaded wireless pANI records and VoIPi2 record types in to the ALI database.

In the transitional NG911 environment, certain of the static subscriber data may be geocoded to a fixed set of coordinates, validated with the MSAG and civic addressing information and stored as a geospatial record. This facilitates the transition to NG911, and allows the subscriber to 'self-check' their service record if desired.

- M. Identify the information sources that Applicant will use to populate the database.

Applicant will obtain data from the originating service providers that operate within the jurisdiction, including wireline, wireless, and VoIP providers, as well as data that is provided by the 9-1-1 System Management.

- N. Describe in detail the manner in which the database will be updated and maintained.

Applicant will receive and process daily update files from all participating carriers or originating service providers. The records will be validated against the MSAG and loaded in to the 9-1-1 database system. Errors will be returned to the originating service provider or 9-1-1 System Management within 24 hours during business hours.

Applicant submits errors to the originating service provider and/or to 9-1-1 System Management for resolution within 24 hours during business days. Applicant provides assistance if needed in facilitating error resolution. The originating service provider works with system management to correct the error and submit an update or error correction to Applicant. Applicant validates the update or correction against the MSAG and processes the record in to the ALI database system within 24 hours of receipt during business days.

Deborah A. Prather
(Signature of Applicant)

PETITIONER AFFIDAVIT

I, Deborah Prather, being duly sworn upon oath, dispose and state that I am Director of Regulatory Affairs for Communications Venture Corporation d/b/a INdigital telecom, that I have knowledge pertaining to the following 83 Illinois Administrative Code Parts described hereafter and that as the applicant will agree to abide by each.

- Code Part 210
- Code Part 215
- Code Part 255
- Code Part 265
- Code Part 270
- Code Part 720 (HB 791 has been sent to Governor for signature to remove this reporting requirement, but it has not be signed yet)
- Code Part 725
- Code Part 726
- Code Part 727
- Code Part 728
- Code Part 730.305, 730.325, 730.330, 730.340, 730.520, 730.550 and 730.600
- Code Part 785

Further Affiant Sayeth Not

Deborah A. Prather
Affiant

Subscribed and sworn to before me on this 24 day of Sept, 2012

Jan L. Swichtenberg
Notary Public

McLean County
State of Illinois



VERIFICATION

This application shall be verified under oath.

OATH

State of Illinois)
)
County of McLean)

Deborah Prather makes oath and says that she is Director of Regulatory Affairs of Communications Venture Corporation d/b/a INdigital telecom and that she has examined the foregoing application and that to the best of her 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.

Deborah Prather
Deborah Prather

Subscribed and sworn to before me, a Notary Public

Notary Public
(Title of person authorized to administer oaths)

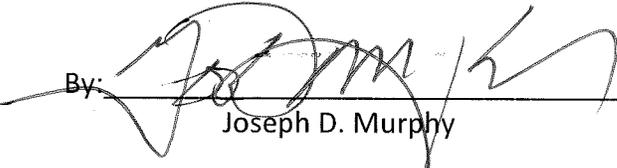
in the State and County above named, this 25 day of September, 2012.

Rose Connell
(Signature of person authorized to administer oath)



Respectfully Submitted,
Communications Venture Corporation
d/b/a INdigital telcom

By: Meyer Capel, A Professional Corporation

By: 
Joseph D. Murphy