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March 19, 2007

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**Via FedEx**

Ms. Sharla Dillon, Docket Room Manager  
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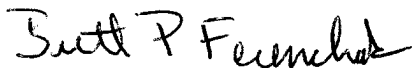
**Re: Docket No. 07-00057 - Joint Petition of Eureka Broadband Corporation, A.R.C. Networks, Inc. and Broadview Networks Holdings, Inc. for Approval of the Indirect Transfer of Control of A.R.C. Networks, Inc. to Broadview Networks Holdings, Inc.**  
**RESPONSE TO DATA REQUEST NO. 1**

Dear Ms. Dillon:

On behalf of Eureka Broadband Corporation, A.R.C. Networks, Inc. and Broadview Networks Holdings, Inc. (collectively, "Petitioners"), enclosed are an original and four (4) copies of Petitioners' Response to Data Request No. 1, dated March 12, 2007. In addition, an electronic copy of this filing is provided on the enclosed diskette.

Please date-stamp the extra copy of this filing and return it in the envelope provided. Should you have any questions please do not hesitate to contact Brett Ferenchak at (202) 373-6697.

Respectfully submitted,



Catherine Wang  
Brett P. Ferenchak

Enclosure

cc: Carlos Black (TRA) (via email)

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**  
**Nashville, Tennessee**

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In the Matter of the Joint Petition of )  
)  
)

**EUREKA BROADBAND CORPORATION,** )  
**A.R.C. NETWORKS, INC.** )  
)

and )  
)

**BROADVIEW NETWORKS HOLDINGS, INC.** )

Docket No. 07-00057

)  
)  
)  
For Approval of the Indirect Transfer of )  
Control of A.R.C. Networks, Inc. to )  
Broadview Networks Holdings, Inc. )  
\_\_\_\_\_ )

**RESPONSE TO DATA REQUEST NO. 1**

Eureka Broadband Corporation ("Eureka Parent"), A.R.C. Networks, Inc. ("A.R.C."), and Broadview Networks Holdings, Inc. ("Broadview Holdings") (collectively, "Petitioners"), provide the following response to the Tennessee Regulatory Authority's ("TRA") Data Request No. 1:

- 1. List any action taken by the FCC and the associated docket number. If a schedule to complete the review of your petition has been established by the FCC, provide such with your response.**

**Response:** Eureka Parent, A.R.C., Eureka Telecom, Inc. ("Eureka"), Eureka Telecom of VA, Inc. ("Eureka-VA"), InfoHighway of Virginia, Inc. ("InfoHighway-VA") (collectively, the "Eureka Companies") and Broadview Holdings filed with the FCC a combined Domestic and International Section 214 Application for the transfer of control of the Eureka Companies. The Domestic Section 214 Application was assigned WC Docket No. 07-41, while the International Section 214 Application was assigned FCC File Nos. ITC-T/C-20070228-00090 and ITC-T/C-20070228-00091. On March 6, 2007, the FCC released a Public Notice establishing a Streamlined Pleading Cycle for the Domestic Section 214 Application: comments concerning the application are due by March 20, 2007; reply comments are due by March 27, 2007; and automatic approval is expected on April 6, 2007. On March 16, 2007, the FCC released a Public Notice accepting the International Section 214 Applications with streamlined treatment.

The International Section 214 Applications are expected to be automatically approved effective March 30, 2007.

- 2. Please provide an explanation of the existing and proposed financing arrangements of Broadview Holdings relevant to this docket filing. Will any Tennessee assets be pledged as collateral for debt issues?**

**Response:** Petitioners would like to clarify that there are no existing and proposed financing arrangements of Broadview Holdings relevant to this docket filing because, although A.R.C. will be pledging its assets in connection with the financing arrangements of Broadview Holdings, A.R.C. does not have any assets located in Tennessee. Nevertheless, Petitioners provide the following explanation of these financing arrangements.

Upon closing of the transfer of control, Eureka Parent and its subsidiaries, including A.R.C., will become guarantors in the existing indebtedness of Broadview Holdings and will pledge their assets as security. These financing arrangements will be in a total aggregate amount of up to \$450 million, which consists of up to \$250 million in financing arrangements of Broadview Holdings described in the Petition approved in Docket Nos. 06-00169 and corporate bonds to be issued by Broadview Holdings with a total aggregate amount of up to \$200 million.

- 3. How will the proceeds from the proposed financing arrangements of Broadview Holdings be used?**

**Response:** The proceeds from the proposed financing arrangements will be used to finance the acquisition of Eureka Parent and its subsidiaries, provide working capital and for general corporate purposes.

- 4. Is approval for the proposed financing required by any federal agency? If so, provide the status of such request.**

**Response:** No. There is no federal agency approval necessary for the proposed financing request.

For the reasons stated in the Petition, Petitioners respectfully submit that the public interest, convenience, and necessity would be furthered by a grant of the Petition on an expedited basis.

Respectfully submitted,

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Dated: March 19, 2007