before the Arizona Corporation Commission

Arizona Corporation Commission

Docketed

William A. Mundel
Chairman

Jim Irvin
Commissioner

Marc Spitzer
Commissioner

Docket No. T-00000D-00-0672

IN THE MATTER OF THE
INVESTIGATION INTO THE COST OF
TELECOMMUNICATIONS ACCESS

Motion by Commission Staff to
Suspend the Procedural Schedule

The Commission Staff initially requested that this Docket be opened to determine if current
statewide access charges reflect their costs. In November, 2001, the Commission Staff filed a
Request for a Procedural Order and included therein a list of questions on which Staff sought
cmtment by interested parties. By Procedural Order dated December 3, 2001, interested parties were
directed to provide written comment on the issues and questions presented no later than January 4,
2002. Based upon the comment received, Staff filed its list of procedural recommendations for this
proceeding, including a proposed procedural schedule. By Procedural Order dated May 21, 2002,
the Hearing Division established a procedural schedule which requires Staff to file testimony in
approximately one month. Because of subsequent issues which have arisen in other dockets and the
need to devote significant Staff resources to resolving those issues, Staff requests that the procedural
schedule in this Docket be suspended indefinitely until Staff has sufficient resources available to
adequately address the very complex and difficult issues raised herein.

At the time Staff requested a procedural schedule in this Docket, Staff was unaware that
developments in other cases would require the diversion and commitment of significant Staff
resources to resolve. Specifically, Staff anticipates having to dedicate significant resources to any
hearing which may be held in the Docket examining Qwest's compliance with Section 252(e) of the
Federal Act. Additionally, several parties have requested that the record in the Section 271
proceeding be reopened to address issues which they claim have not been resolved as a result of
agreements between Qwest and Eschelon. Staff’s review of these requests will take considerable time. In addition, significant Staff resources will be needed to address ongoing proceedings involving Customer Proprietary Network Information (CPNI) and the plans submitted by Arizona ETCs for study area disaggregation to determine Federal universal service funds in the future. All of these dockets raise very complex and difficult issues all of which will require significant Staff attention in the next few months.

While Staff believes that this Docket is also important, and should be resolved as soon as possible, Staff has already devoted significant resources to many of the Dockets listed above and believes they should be completed before the records become stale and much of the work must be repeated. Still another docket referenced may impact the amount of Federal universal service funds available to some Arizona carriers, and as such its timely completion is important.

Finally, the issues raised in this Docket are very complex and will require significant Staff time. The issues do not only involve costing issues, but universal service issues as well. Some of the more important issues are set forth in the Hearing Division’s most recent procedural order in this Docket dated May 21, 2002.

WHEREFORE, the Arizona Commission Staff respectfully requests that due to the magnitude of other proceedings now pending requiring significant Staff resources, that the procedural schedule in this case be suspended indefinitely until such time as Staff is able to commit the level of resources that are necessary given the importance of the issues raised in this Docket.

RESPECTFULLY submitted this 28th day of June, 2002.

Maureen A. Scott
Attorney, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 84007
Telephone: (602) 542-6022
Facsimile: (602) 542-4870
e-mail: maureenscott@cc.az.state.us
The Original and ten copies of the foregoing were filed this 20th day of June, 2002 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

Copies of the foregoing were mailed the 20th day of July, 2002 to:

Scott Wakefield, Chief Counsel
RUOC
2828 N. Central Avenue, Suite 1200
Phoenix, AZ 85004-1022

Timothy Berg
Theresa Dwyer
Fennemore Craig
3003 N. Central Avenue, Suite 2600
Phoenix, AZ 85012

Accipiter Communications Inc.
2238 W. Lone Cactus Dr., Suite 100
Phoenix, AZ 85027

Arizona Telephone Company
PO Box 5158
Madison, WI 53705-0158

Centurytel of the Southwest, Inc.
Centurytel
P O Box 4065
Monroe, LA 71211-4065

Copper Valley Telephone, Inc.
PO Box 970
Willcox, AZ 85644-0000

Midvale Telephone Exchange
PO Box 7
Midvale, ID 83645-0000

Rio Virgin Telephone Company
Rio Virgin Telephone & Cablevision
PO Box 189
Estacada, OR 97023-0000

South Central Utah Telephone Association, Inc.
PO Box 226
Escalante, UT 84726-0000

Southwestern Telephone Co, Inc.
PO Box 5158
Madison, WI 53705-0158

Table Top Telephone Company, Inc.
600 N Second Avenue
AJO, AZ 85321-0000

Valley Telephone Cooperative Inc.
752 E Malley Street, P O BOX 970
Willcox, AZ 85644

Verizon California Inc.
One Verizon Way - CA500GCF
Thousand Oaks. CA 91362-3811

Richard S. Wolters
AT&T
1875 Lawrence Street, Suite 1575
Denver, Colorado 80202

Gregory Hoffman
AT&T
795 Folsom Street, Rm. 2159
San Francisco, CA 94107-1243

Bethany M. Erwin
Senior Counsel – Product & Policy
McLeodUSA
P. O. BOX 3177
Cedar Rapids, IA 52406

Michael Grant
Todd Wiley
Gallagher & Kennedy, PA
2575 East Camelback Road
Phoenix, Arizona 85016

Curt Huttsell, Director,
State Government Affairs
Citizens Telecommunications Company of Arizona L.L.C.
4 Triad Center, Suite. 200
Salt Lake City, UT 84180
| 1  | Comm South Companies Inc.  
    | 2909 N. Buckner Blvd., Ste. 800  
    | Dallas, TX 75228-0000  |
| 2  | K. Megan Doberneck  
    | Covad Communications Company  
    | 7901 Lowry Boulevard  
    | Denver, CO 80230  |
| 3  | Brad Carroll  
    | Cox Communications  
    | 20401 North 29th Avenue  
    | Phoenix, AZ 85027-0000  |
| 4  | Michael W. Patten  
    | Roshka Heyman & Dewulf PLC  
    | One Arizona Center  
    | 400 E. Van Buren Street, Suite 800  
    | Phoenix, Arizona 85004  |
| 5  | Digital Services Corporation  
    | 211 N. Union St, Ste. 300  
    | Alexandria, VA 22314  |
| 6  | Eschelon Telecom of Arizona, Inc.  
    | 730 Second Ave. South, Suite 1200  
    | Minneapolis, MN 55402-0000  |
| 7  | Intermedia Communications Inc  
    | One Intermedia Way  
    | Tampa, FL 33647-1752  |
| 8  | Jato Operating Corp.  
    | 1099 Eighteenth St., Suite 700  
    | Denver, CO 80202  |
| 9  | Level 3 Communications, LLC  
    | 1025 Eldorado Blvd.  
    | Broomfield, CO 80021  |
| 10 | Max-Tel Communications, Inc.  
    | 105 N. Wickham, P. O. BOX 280  
    | Alvord, TX 76225-0000  |
| 11 | Teresa Tan, Senior Attorney  
    | MCI WorldCom Communications  
    | [Metropolitan Fiber Systems]  
    | Department 9976  
    | 201 Spear Street, Floor 9  
    | San Francisco, CA 94105  |
| 12 | Thomas Campbell  
    | Michael Hallam  
    | LEWIS & ROCA  
    | 40 N. Central Avenue  
    | Phoenix, Arizona 85004  |
| 13 | Brian Thomas, VP Regulatory-West  
    | Time Warner Telecom, Inc.  
    | 520 SW 6TH Avenue, Suite 300  
    | Portland, Oregon 97204  |
| 14 | Mountain Telecommunications, Inc.  
    | 1430 W. Broadway, Suite 8200  
    | Tempe, AZ 85282  |
| 15 | North County Communications Corporation  
    | 3802 Rosencrans, Suite 485  
    | San Diego, CA 92110-0000  |
| 16 | Onepoint Communications  
    | Two Conway Park, 150 Field Dr., Suite 300  
    | Lake Forest, IL 60045-0000  |
| 17 | RCN Telecom Services, Inc.  
    | 105 Carnegie Center  
    | Princeton, NJ 08540-0000  |
| 18 | Reflex Communications, Inc.  
    | 1601 Fifth Avenue, Suite 710  
    | Seattle, WA 98101-1625  |
| 19 | Eric S. Heath  
    | Sprint Communications Company L. P.  
    | 100 Spear Street, Suite 930  
    | San Francisco, CA 94105  |
| 20 | Steven J. Duffy  
    | Ridge & Isaacson P.C.  
    | 3101 N. Central Avenue, Suite 1090  
    | Phoenix, AZ 85012-2638  |
| 21 | The Phone Company/Network Services of New Hope  
    | 6805 Route 202  
    | New Hope, PA 18938-0000  |
| 22 | Verizon Select Services, Inc.  
    | HQK02D84  
    | 6665 N MacArthur Blvd,  
    | Irving, TX 75039-0000  |
| 23 | Winstar Wireless of Arizona, Inc.  
    | 1577 Spring Hill Rd. Floor 2  
    | Vienna, VA 22182-  
    | 360networks (USA) Inc.  
    | 12101 Airport Way  
    | Broomfield, CO 80021  |
| 24 | ALLCOM USA  
    | 2151 E. Convention Cntr Way, Ste 207-A  
    | Ontario, CA 91764-4483  |
1. Alliance Group Services, Inc.
   1221 Post Road East
   Westport, CT 06880-0000

2. Archtel, Inc.
   1800 West Park Drive, Suite 250
   Westborough, MA 01581-0000

3. Enhanced Communications Network, Inc.
   37 Wintrop Place
   Hazlet, NJ 07730-0000

4. Ernest Communications, Inc.
   6475 Jimmy Carter Blvd., Suite 300
   Norcross, GA 30071-0000

5. GST Net, Inc.
   4001 Main Street
   Vancouver, WA 98663

6. IG2, INC.
   80-02 Kew Garden Road, Suite 5000
   Kew Gardens, NY 11415-0000

7. Main Street Telephone Company
   200 Ithan Creek Avenue
   Villanova, PA 19085

8. NET-TEL CORPORATION
   11921 Freedom Drive
   Reston, VA 20190

9. Nextlink Long Distance Services, Inc.
   3930 E. Watkins, Suite 200
   Phoenix, AZ 85034

10. Opex Communications, Inc.
    500 East Higgins Road, Ste. 200
    Elk Grove Village, IL 60007-0000

11. Pac-West Telecomm, Inc.
    1776 W. March Lane #250
    Stockton, CA 95207

12. Teligent Services, Inc.
    8065 Leesburg Pike, Suite 400
    Vienna, VA 22182-0000

13. Touch America
    130 N. Main Street
    Butte, MT 59701

14. VYVX, LLC
    Williams Local Network, Inc.
    One Technology Center, Mail Drop TC-7B
    Tulsa, OK 74103

15. Western CLEC Corporation
    3650 131st Ave. SE, Suite 400
    Bellevue, WA 98006-0000

16. Joan S. Burke
    Osborn & Maledon
    2929 N. Central Avenue, 21st St.
    Phoenix, AZ 85067-6379

Viola R. Kizis
Assistant to Maureen A. Scott