Citizens Communications Company, Navajo Communications Company, Inc., Citizens Telecommunications Company of White Mountains, Inc., dba Frontier Communications of White Mountains and Citizens Utilities Rural Company, Inc., dba Frontier Citizens Utilities Rural (collectively, “Citizens”), hereby moves the Arizona Corporation Commission (“Commission”) pursuant to A.A.C. R14-109(H) to consolidate the above-captioned docket, Docket No. T-00000D-00-0672 with Docket No. RT-00000H-97-0137, In the Matter of Review and Possible Revision of Arizona Universal Service Fund Rules. The issues in each docket are substantially related and that the rights of all parties of record will not be prejudiced by such consolidation.

Further, on or about June 28, 2002, Staff filed a Motion to Suspend Procedural Schedule for an indefinite period of time. The Commission granted Staff’s Motion. Citizens hereby requests that the Commission reconsider the decision to suspend the procedural schedule for an indefinite period of time and limit such suspension to a period of 30 to 45 days.

Further, Citizens respectfully requests the Commission allow Citizens the opportunity to update its testimony in this docket once the suspension is lifted.
Finally, Citizens Communications requests that the Commission require all parties of record to provide copies of all filings to all parties on the service list.

WHEREFORE, for all the foregoing reasons:

Citizens respectfully requests that the Commission issue an order granting this Motion to Consolidate.

Further, Citizens respectfully requests that the Commission reconsider suspending the procedural schedule for an indefinite period and limit such suspension to 30 to 45 days.

Further, Citizens respectfully requests the Commission allow Citizens the opportunity to update its testimony in this docket.

Finally, Citizens respectfully requests that the Commission issue an order requiring all parties of record to provide copies of all filings to all parties on the service list.

RESPECTFULLY SUBMITTED this 1st day of August, 2002.

CHEIFETZ & IANNITELLI, P.C.

By:  [Signature]

Original and eighteen (18) copies of the foregoing filed this 1st day of August, 2002, with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007
Copies of the foregoing hand-delivered
this 1st day of August, 2002, to:

2 Lyn Farmer, Chief Hearing Officer
ARIZONA CORPORATION COMMISSION
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Phoenix, Arizona 85007

4 Chris Kemply, Chief Counsel
Legal Division
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1200 West Washington Street
Phoenix, Arizona 85007

7 Ernest Johnson, Director
Utilities Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

10 All parties of record on the service list

By [Signature]

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