
Citizens states in support of its Motion that "[t]he issues in each docket are substantially related and that the rights of all parties of record will not be prejudiced by such procedure." Id. at p. 1. Staff disagrees and submits that the issues and procedural tracks for these Dockets are substantially different such that consolidation would not be appropriate. In addition, Citizens had ample opportunity to raise this issue before now, when both proceedings are well underway.

With regard to the issues being addressed, the investigation into the cost of telecommunications access is examining whether the access charges of Arizona ILECs reflect their costs, and if not, what is the appropriate cost structure in the future. The AUSF rulemaking docket is examining whether changes to the current AUSF rules are appropriate given universal service fund changes at the federal level. The only link between the two Dockets is the issue of whether any
access charge reductions brought about through restructuring, should be covered through the Arizona
Universal Service Fund, or other methods such as end user surcharges or rate revisions. Staff does
not believe that the Dockets need to be consolidated to address this issue. In fact, given the
complexity of the issues in each of the respective Dockets, Staff submits that it would be less
confusing to address the universal service and access cost issues separately.

With regard to process, both Dockets are on much different procedural tracks. The Access
Charge Docket is being conducted through an evidentiary hearing process, which is appropriate,
given the nature of the issues. Further, parties have already filed initial testimony in the Access
Charge Docket. Thus, to substantially revise and significantly expand the scope of the proceeding at
this late date, as Citizens suggests, would be inadvisable. The AUSF Docket, on the other hand, is
looking at possible revisions to the Arizona Universal Service Fund Rules, through a rulemaking
proceeding. The issues raised in the AUSF Docket, thus by their nature, are more conducive to a
workshop process.

In addition, Citizens had ample opportunity to raise this issue before now. The Access Charge
Docket was opened on September 5, 2000. On December 4, 2001, Citizens and other interested
parties were asked to comment on Staff's proposed issues list. On March 28, 2002, Staff filed its list
of procedural recommendations and comment by parties was once again solicited. To Staff's
knowledge, Qwest was the only party to respond. On May 21, 2002, the Administrative Law Judge
adopted Staff's recommendations. Intervenor direct testimony was filed on June 28, 2002. The
AUSF Docket has also been pending for sometime and there have been written comments filed and at
least one workshop held.

Finally, for the reasons set forth in its June 28, 2002 Motion to Suspend Procedural Schedule,
Staff also requests that the Commission deny Citizen's Motion for Reconsideration of its July 8, 2002
Procedural Order.

WHEREFORE, Staff respectfully requests that the Commission deny Citizen's Motion to
Consolidate and Motion For Reconsideration.
RESPECTFULLY SUBMITTED this 16th day of August, 2002.

Maureen A. Scott
Attorney, Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
Telephone: (602) 542-6022
Facsimile: (602) 542-4870
e-mail: maureenscott@cc.state.az.us

Original and ten copies of the foregoing
were filed this 16th day of August, 2002, with:

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

Copies of the foregoing were mailed and/or
hand-delivered this 16th day of August, 2002, to:

Scott Wakefield, Chief Counsel
RUCO
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 South West, 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

Brad Carroll
Cox Communications
20401 North 29th Avenue
Phoenix, AZ 85027-0000

Michael W. Patten
Roshka Heyman & Dewulf PLC
One Arizona Center
400 E. Van Buren Street, Suite 800
Phoenix, Arizona 85004

Digital Services Corporation
211 N. Union St, Ste. 300
Alexandria, VA 22314

Eschelon Telecom of Arizona, Inc.
730 Second Ave. South, Suite 1200
Minneapolis, MN 55402-0000

Intermedia Communications Inc
One Intermedia Way
Tampa, FL 33647-1752

Jato Operating Corp.
1099 Eighteenth St., Suite 700
Denver, CO 80202

Level 3 Communications, LLC
1025 Eldorado Blvd.
Broomfield, CO 80021

Max-Tel Communications, Inc.
105 N. Wickham, P. O. BOX 280
Alvord, TX 76225-0000
| 1 | Teresa Tan, Senior Attorney  
MCI WorldCom Communications  
[Metropolitan Fiber Systems]  
Department 9976  
201 Spear Street, Floor 9  
San Francisco, CA 94105 |
| 2 | Thomas Campbell  
Michael Hallam  
LEWIS & ROCA  
40 N. Central Avenue  
Phoenix, Arizona 85004 |
| 3 | Brian Thomas, VP Regulatory-West  
Time Warner Telecom, Inc.  
520 SW 6TH Avenue, Suite 300  
Portland, Oregon 97204 |
| 4 | Mountain Telecommunications, Inc.  
1430 W. Broadway, Suite 8200  
Tempe, AZ 85282 |
| 5 | North County Communications Corporation  
3802 Rosencrans, Suite 485  
San Diego, CA 92110-0000 |
| 6 | Onepoint Communications  
Two Conway Park, 150 Field Dr., Suite 300  
Lake Forest, IL 60045-0000 |
| 7 | RCN Telecom Services, Inc.  
105 Carnegie Center  
Princeton, NJ 08540-0000 |
| 8 | Reflex Communications, Inc.  
1601 Fifth Avenue, Suite 710  
Seattle, WA 98101-1625 |
| 9 | Eric S. Heath  
Sprint Communications Company L. P.  
100 Spear Street, Suite 930  
San Francisco, CA 94105 |
| 10 | Steven J. Duffy  
Ridge & Isaacson P.C.  
3101 N. Central Avenue, Suite 1090  
Phoenix, AZ 85012-2638 |
Main Street Telephone Company
200 Ithan Creek Avenue
Villanova, PA 19085

NET-TEL CORPORATION
11921 Freedom Drive
Reston, VA 20190

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

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

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

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

Touch America
130 N. Main Street
Butte, MT 59701

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

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

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

Jon Poston
ACTS
6733 E. Dale Lane
Cave Creek, AZ 85331

Deborah A. Amaral
Assistant to Maureen A. Scott