BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN

JIM IRVIN
COMMISSIONER

MARC SPITZER
COMMISSIONER

Arizona Corporation Commission
DOCKETED

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IN THE MATTER OF INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

WORLDCOM, INC.'S RESPONSE TO
CITIZENS' MOTION TO CONSOLIDATE AND
MOTION FOR RECONSIDERATION

WorldCom, Inc., on behalf of its Arizona operating affiliates ("WorldCom"), joins in the
Arizona Corporation Commission Staff's opposition to Citizens' motion to consolidate. While
WorldCom concurs with the Staff's opposition to consolidation, WorldCom urges the
Administrative Law Judge to reconsider the indefinite suspension of the access case. WorldCom
requests that the access case be suspended for 90 days and then revisited at that time for the
reasons set forth in WorldCom's July 8, 2002 Response to Staff's Motion to Suspend Procedural
Schedule. A copy of WorldCom's July 8, 2002 Response is attached. Finally, WorldCom notes
that despite being on the service list in this case, it did not receive a copy of Citizens’ motion to consolidate and requests that it receive such filings in the future.

Respectfully submitted this 20th day of August, 2002.

LEWIS AND ROCA LLP

[Signature]

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Attorneys for WorldCom, Inc.

ORIGINAL AND ten (10) copies of the foregoing hand-delivered this 20th day of August, 2002, to:

Arizona Corporation Commission
Utilities Division – Docket Control
1200 W. Washington Street
Phoenix, Arizona 85007

COPY of the foregoing hand-delivered this 20th day of August, 2002, to:

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Chief ALJ, Hearing Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

Christopher Kempley, Esq.
Chief Counsel, Legal Division
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COPIES of the foregoing mailed  
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WorldCom, Inc., on behalf of its operating affiliates ("WorldCom"), appreciates the Staff's desire for an extension of this access charge proceeding due to the other telecommunications proceedings now pending before the Arizona Corporation Commission (the "Commission"). However, WorldCom respectfully requests that the suspension not be indefinite but rather for ninety days. If, prior to the end of this ninety day extension, other proceedings are still requiring significant Staff resources, the Staff can request an additional extension. On the other hand, some of the pending telecommunications proceedings may have been concluded by that time or, at least, the hearing division will be in a better position to evaluate the status of those
proceedings. WorldCom respectfully requests that the Staff’s motion for an extension be granted, but only for ninety days.

Respectfully submitted this 8th day of July, 2002.

LEWIS AND ROCA LLP

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