BEFORE THE ARIZONA CORPORATION COMMISSION

Chairman
WILLIAM A. MUNDELL
Commissioner
MIKE GLEASON
Commissioner
JEFF HATCH-MILLER
Commissioner
KRISTIN K. MAYES
Commissioner

IN THE MATTER OF INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

DOCKET NO. T-00000D-00-0672
QWEST CORPORATION'S
RESPONSE TO AT&T'S MOTION
TO COMPEL

INTRODUCTION

Qwest Corporation hereby responds to AT&T’s motion to compel. AT&T’s data requests seek information pertaining to interexchange services that is wholly irrelevant to this docket, which was established to determine whether current access charges reflect the cost of access. Furthermore, AT&T seeks data from Qwest Corporation over which Qwest Corporation does not have custody or control because such data is in the custody and control of affiliates, which are separate and distinct corporate entities. Finally, Qwest Corporation would suffer undue burden if required to answer many of AT&T’s requests because not only is the data requested irrelevant and not within Qwest Corporation’s custody or control, the documents from which such data would be developed are voluminous and would require an independent analysis and study to produce complete responses.

DISCUSSION

1. The Costs of Interexchange Access Services Are Irrelevant To This Docket.

In its motion, AT&T admits that the majority of its data requests and the information sought therein does not relate to Qwest access services and concern
interexchange services. Specifically, data requests 01-002, 01-004, 01-005, 01-006, 01-007, 01-009, 01-010, 01-012, 01-013, 01-014, 01-015, 01-016, 01-017, 01-018, 01-019, 01-020, 01-021, 01-022, 01-023, 01-025, 01-026, 01-027, and 01-028 request data on interexchange services, interLATA charges, and other services wholly unrelated to access services. See AT&T Data Requests, attached as Exhibit A. AT&T argues that such data is relevant to the any decision the Commission may make on restructuring or setting rates for intrastate access charges charged by Qwest Corporation to service providers such as AT&T. AT&T’s assertions are in error.

The scope of this docket is only to examine whether “access charges currently in effect reflect the cost of access.” See Procedural Order, November 18, 2003, p. 1; see also Request for an Investigatory Docket Regarding the Costs of Access, December 5, 2000 (“Chairman Kunasek requested that a docket be opened to investigate the costs of telecommunications access to determine if access charges currently in effect for Arizona Telecommunications utilities reflect the cost of access.”). Qwest Corporation’s costs incurred in providing interexchange services and the authorized rates it charges for these services are dependent on factors other than access charges.

The crux of AT&T’s arguments is that without such information, the Commission will be unable to set a rate for intrastate access charges that will ensure Qwest Corporation cannot impose a price squeeze on long distance providers (such as AT&T), after market entry by a separate affiliate (holding a separate CC&N) providing long distance service. Without any factual proof of a price squeeze, AT&T predicts that a rate of $.05 per minute would result in a price squeeze. First, it is clear that AT&T is conducting extensive discovery based upon a rate that is not a rate for access service. In any event, Qwest Corporation believes that other carriers providing interexchange services in Arizona have plans with similar rates. AT&T has not filed a complaint challenging any of these rates charged by other carriers nor filed a complaint challenging
QCC's or QLDC's rates. Such proceedings would be the appropriate forum for challenging these rates. Second, such rates are not an indicator of the cost of access, which is the focus of this docket.

Further, AT&T's argument fails to take into account that statutory protections already exist to prevent exactly the results AT&T alleges. Section 272 of the Telecommunications Act requires that any organization providing long distance services must be a separate affiliate from local exchange carriers such as Qwest Corporation. 47 U.S.C. § 272(a). The separate affiliates must operate independently and maintain separate financial records, must have separate officers, directors, and employees, and must transact any business at arms length with the operating company, subject to public inspection of transaction documents. 47 U.S.C. § 272(b). The Act further provides that the operating company must not discriminate between the affiliate and any other entity in the provisions or procurement of services. 47 U.S.C. § 272(c). The Act specifically creates an obligation to charge equal rates between affiliates and non-affiliated entities. 47 U.S.C. § 272(e). Under the Act, Qwest Corporation is obligated to provide access at the same rate to both affiliates and non-affiliates.

Retail rates ultimately charged to end users by the affiliates and non-affiliates are not indicative of the costs of access; they are independently calculated after a cost-based access charge is imposed on the affiliate or non-affiliate. Any such retail rate would also include, in addition to access charges, all other charges and tariffs along with a reasonable markup.

It cannot be overlooked that any price squeeze issues remain speculative. Price squeeze issues that might exist in the future are expressly not a subject of this docket, i.e., whether Qwest Corporation's current access charges reflect cost of access.

Although Chairman Spitzer may have found AT&T's concerns about the potential for a price squeeze of interest, his request for an expedited analysis of Qwest
Corporation's access costs did not expand the scope of this proceeding to examine interexchange costs and charges; nor did it change the parameters by which any access charge is calculated and compel access charges to be calculated below actual cost. Accordingly, the scope of these proceedings has not been altered, nor does it reach costs or charges for interexchange services.

Finally, AT&T's argument that because it has offered testimony regarding a "hypothetical" price squeeze, this should be sufficient to broaden the scope of these proceedings is also unreasonable. To allow parties who submit irrelevant testimony, in another docket, to alter the scope of Commission proceedings would open the door to unlimited alteration and expansion of proceedings before the Commission.

2. **Qwest Corporation Is Not Required To Produce Information Regarding Affiliates.**

Pursuant to the Arizona Civil Rules of Procedure, a party is only obligated to produce information, whether through interrogatories or through requests for production, that are available or in the control of the party to whom the request is directed. See ARCP 33(a) (the party to whom the request is directed "shall furnish such information as is available to the party."); ARCP 34(a) (a party may request production of documents "which are in the possession, custody, or control of the party upon whom the request is served."). The Telecommunications Act, and specifically Section 272, does not change, modify, or expand the scope of discovery in this proceeding.

AT&T has requested data from Qwest Corporation that is data held, controlled, and concerning Qwest Corporation affiliates. AT&T has requested data from and regarding affiliates in data requests 01-002, 01-003, 01-004, 01-005, 01-007, 01-008, 01-009, 01-010, 01-011, 01-012, 01-013, 01-017, 01-019, 01-020, 01-021, 01-022, 01-023, 01-025, 01-026, 01-027, and 01-028. AT&T mischaracterizes the Telecommunications Act as forcing Qwest Corporation to produce data regarding its affiliates as a result of a
misguided and overly broad, analysis of Section 272. AT&T argues that Section 272 mandates that in this proceeding, more specifically in discovery conducted in this proceeding, Qwest Corporation must produce data from affiliates that are not parties to the proceeding in order to determine whether the access charges imposed by Qwest Corporation, not any affiliate, reflect the cost of providing access incurred by Qwest Corporation. AT&T asserts that any arguable jurisdiction Section 272 retains for states provides them with the power to force Qwest Corporation to provide such data, specifically data over which Qwest Corporation has no control, from a separate corporate affiliate in response to discovery requests under limited proceedings on limited issues that do not involve that affiliate. AT&T’s arguments stretch the applicability of Section 272 beyond reason and any known legal principle.

Section 272 provides safeguards against anticompetitive practices by mandating corporate separation between Qwest Corporation and its affiliates. 47 U.S.C. § 272. The safeguards provided require Qwest Corporation to maintain complete financial and structural separation from affiliates. 47 U.S.C. § 272(b). The mandates for corporate separation render Qwest Corporation unable to provide the information requested as a result of such corporate separation. Qwest Corporation simply cannot control or direct such affiliates.

Section 272(d), while maintaining some level of state authority for review of certain issues subject to federal jurisdiction (customarily related to issues within a state and normally subject to state regulation), does not provide an obligation for Qwest Corporation to produce data from its affiliates in this hearing and related discovery. Section 272(d) requires Qwest Corporation, with its affiliates, to provide audits to demonstrate compliance with Section 272 as a whole. Section 272(d) does not create an affirmative obligation for Qwest Corporation to maintain records, or maintain control of data in those records, of separate corporate affiliates.
AT&T asserts that the obligations created by Section 272(d) create an affirmative duty for Qwest Corporation to provide affiliate data in this proceeding. AT&T is wrong. Section 272(d) requires that Qwest Corporation provide information, along with its affiliates, for an audit on a biennial basis. 47 U.S.C. § 272(d). The statute does not provide an affirmative duty upon Qwest Corporation to maintain data from the same affiliates the Act mandates to operate separately and distinct from Qwest Corporation. Compare 47 U.S.C. § 272(d) with 47 U.S.C. § 272(b). The only aspect of corporate identity shared between Qwest Corporation and its Affiliates are shareholders. All other aspects must remain separate and distinct pursuant to Section 272 (b).

The separate corporate affiliates are the proper parties to whom AT&T must direct data requests regarding those affiliates' data. The fact that corporate affiliates are not parties to this proceeding does not create any duty upon Qwest Corporation to produce the affiliate data. Further, in so much as any affiliates do not impose charges for access, such data, as discussed above, is irrelevant to this proceeding.

3. **Qwest Corporation Is Not Required To Produce Data Where Producing The Data Is Unduly Burdensome Or Requires A Special Study Or Analysis**

Discovery may be limited where the "discovery is unduly burdensome or expensive, given the needs of the case, the amount in controversy, limitations on the parties' resources, and the importance of the issues at stake in the litigation." ARCP 26(b)(1)(iii); see also, State Farm Mutual Automobile Ins. Co. v. Superior Court, County of Maricopa, 167 Ariz. 135, 139 (App. 1991). This is especially true, where, as here, AT&T is seeking massive compilations of data and special analysis of that data on issues not within the scope of this proceeding, and/or data held by separate corporate entities over which Qwest Corporation has no control.

Qwest Corporation has objected to seven out of the twenty-eight data requests on the basis that the requests are overly broad and unduly burdensome. Qwest objected to
data requests 01-002, 01-006, 01-017, 01-020, 01-023, 01-027, 01-028 on this basis, as well as the other grounds articulated in this response. Of the seven requests, Qwest Corporation objected to, all seven requests seek information regarding interexchange services, which is irrelevant for the reasons previously discussed. Further, six out of the seven requests ask for information and data of affiliates, which is not within the control or custody of Qwest Corporation.

Data Request No. 01-002 seeks imputation studies, for the past eight years, for each toll service or package offered by Qwest Corporation in Arizona, including all filings regarding imputation for toll services made with the Commission. Such data is again irrelevant. The eight-year range for records requested is unduly broad and would impose an undue burden on Qwest Corporation. To the extent that this information is in the custody and control of Qwest Corporation affiliates, Qwest Corporation is not obligated to acquire such information from the separate corporate entities.

Data Request No. 01-006 requests information regarding billing and collection services provided to interexchange carriers. Such information is irrelevant to the cost of access. Qwest Corporation objected on the grounds that it would require a special study since the specific data and analysis of that data requested is not regularly maintained by Qwest Corporation. Qwest Corporation has already provided the data it has available and has provided its analysis of that data in response to AT&T. The special study would require the expenditure of significant expenses to provide AT&T information that is not the subject of this proceeding and would create an undue burden on Qwest Corporation.

Data Request No. 01-017 requests data on each local exchange end user customer served by Qwest Corporation over the past eight years and those customers presubscribed to toll services provided by Qwest Corporation or its affiliates. Coupled with the irrelevance of such data to this proceeding, and Qwest Corporation’s lack of control or

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1 Only Data Request No. 01-006 did not seek information regarding affiliates.
custody over much of the data, compiling this information would create an undue burden on Qwest Corporation.

Data Request No. 01-020 seeks information regarding toll services offered by Qwest Corporation affiliates and the costs those affiliates incur in providing such services. Again, as discussed above, the toll service data is irrelevant to the cost of access and data on affiliates is not within the control and custody of Qwest Corporation, and would create an undue burden on Qwest Corporation.

Data Requests No. 01-020 and No. 01-027 request data on marketing costs per subscriber for both Qwest Corporation and its affiliate subscribers for intraLATA or interLATA services and the costs of marketing services paid by those affiliates. Marketing data is not relevant to the cost of access and data from affiliates is not within the custody or control of Qwest Corporation.

Data Request No. 01-028 requests data on each intraLATA toll service Qwest Corporation resold to affiliates. Toll service data is not relevant to the cost of access. Further, Qwest Corporation does not have custody or control over affiliate data. Producing irrelevant data on toll services, particularly where Qwest Corporation does not have custody or control over the data, would create an undue burden on Qwest Corporation.

4. **Consolidation Into the Price Cap Plan Renewal Docket Recognizes That the Issue is Not Whether, but How Switched Access Rates Will be Lowered**

Qwest Corporation has not opposed rate reductions for switched access charges, provided that such reductions occur in a revenue neutral manner.

In light of this recognition, AT&T's data requests regarding the cost of interexchange services are not only irrelevant, but unnecessary. The scope of this docket was to examine whether access charges currently in effect reflect the cost of access.
AT&T’s “price squeeze” issue is simply unrelated to the scope and intent of this proceeding, which is to ensure that access charges are lowered consistent with mechanisms and procedures outlined in the Arizona Constitution.

CONCLUSION

A majority of AT&T’s data requests, as discussed herein, are merely a fishing expedition that would expand these proceedings beyond its established scope. AT&T’s assertion that it seeks to avoid a “price squeeze” when a Qwest Corporation affiliate provides long distance services is merely speculative. Qwest Corporation’s obligations pursuant to the Telecommunications Act, particularly the corporate separation mandates contained in Section 272, render Qwest Corporation the improper party with whom to address any such price squeezes issues if they arise in the future. This proceeding is limited to whether the charges currently imposed for access reflect the cost of access. Accordingly, Qwest Corporation respectfully requests that AT&T’s motion to compel be denied.

DATED this 6th day of December, 2003.

FENEMORE CRAIG, P.C.

By

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Phoenix, AZ 85027

South Central Utah Telephone Association, Inc.
PO Box 226
Escalante, UT 84726-000
1  Southwestern Telephone Co., Inc.
   PO Box 5158
   Madison, WI  53705-0158
2  Centruytel
   PO Box 4065
   Monroe, LA  71211-4065
3  Table Top Telephone Co., Inc.
   600 N. Second Avenue
   Ajo, AZ  85321-0000
4  Citizens Utilities Rural Co. Inc.
   Citizens Communications Co. of Arizona
   4 Trial Center, Suite 200
   Salt Lake City, UT  84180
5  Valley Telephone Cooperative, Inc.
   752 E. Malley Street
   PO Box 970
   Willcox, AZ  85644
6  Copper Valley Telephone, Inc.
   PO Box 970
   Willcox, AZ  85644
7  Verizon California Inc.
   One Verizon Way – CA500GCF
   Thousand Oaks, CA  91362-3811
8  Midvale Telephone Exchange
   PO Box 7
   Midvale, ID  83645
9  AT&T Communications of the Mountain States, Inc.
   1875 Lawrence Street, Room 1575
   Denver, CO  80202
10 Navajo Communications Co., Inc.
    4 Triad Center, Suite 200
    Salt Lake City, UT  84180
11 Brooks Fiber Communications of Tucson, Inc.
    201 Spear Street, 9th Floor
    San Francisco, CA  94105
12 Caprock Telecommunications Corporation
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    Dallas, TX  75248
Citizens Long Distance Co.
5600 Headquarters Drive
Plano, TX 75024

Citizens Telecommunications Co. of the White Mountains, Inc.
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Salt Lake City, UT 84180

Max-Tel Communications, Inc.
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Alvord, TX 76225

Comm South Companies, Inc.
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Dallas, TX 75228

MCI WorldCom Communications
201 Spear Street, 9th Floor
San Francisco, CA 94105

Covad Communications Co.
4250 Burton Drive
Santa Clara, CA 95054

MCIMetro
201 Spear Street, 9th Floor
San Francisco, CA 94105

Cox Communications
20401 N. 29th Avenue
Phoenix, AZ 85027

Metropolitan Fiber Systems of Arizona, Inc.
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San Francisco, CA 94105

Digital Services Corp.
211 N. Union Street, Ste. 300
Alexandria, VA 22314

Mountain Telecommunications Inc.
2540 E. 6th Street
Tucson, AZ 85716

e.Spire
131 National Business Parkway, Ste. 100
Annapolis Junction, MD 20701
1 North County Communications Corporation
   3802 Rosencrans, Ste. 485
   San Diego, CA 92110
2
3 Electric Lightwave, Inc.
   4 Triad Center, Ste. 200
   Salt Lake City, UT 84180
4
5 One Point Communications
   Two Conway Park
   150 Field Drive, Ste. 300
   Lake Forest, IL 60045
6
7 Eschelon Telecom of Arizona, Inc.
   730 Second Avenue South, Ste. 1200
   Minneapolis, MN 55402
8
9 RCN Telecom Services, Inc.
   105 Carnegie Center
   Princeton, NJ 08540
10
11 Global Crossing Local Services, Inc.
   180 South Clinton
   Rochester, NY 14646
12
13 Reflex Communications, Inc.
   83 South King Street, Ste. 106
   Seattle, WA 98104
14
15 Global Crossing Telemanagement, Inc.
   180 South Clinton
   Rochester, NY 14646
16
17 Rhythm Links, Inc.
   9100 E. Mineral Circle
   Englewood, CO 80112
18
19 Intermedia Communications, Inc.
   One Intermedia Way
   Tampa, FL 33647-1752
20
21 Sprint Communications Company, L.P.
   6860 W. 115th, MS:KSOPKD0105
   Overland Park, KS 66211
22
23 Jato Operating Corporation
   6200 Syracuse Way, Ste. 200
   Englewood, CA 80111
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26
1. TCG Phoenix  
   1875 Lawrence Street, Room 1575  
   Denver, CO 80202

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

3. The Phone Company/Network Services of New Hope  
   6805 Route 202  
   New Hope, PA 18938

4. Verizon Select Services Inc.  
   6665 MacArthur Blvd, HQK02D84  
   Irving, TX 75039

5. IG2, Inc.  
   80-02 Kew Garden Road, Ste. 5000  
   Kew Gardens, NY 11415

6. Winstar Wireless of Arizona  
   1577 Spring Hill Road, 2nd Fl.  
   Vienna, VA 22182

7. Independent Network Services Corp. (FN)  
   2600 N. Central Avenue, Ste. 1750  
   Phoenix, AZ 85004  
   XO Arizona Inc.  
   3930 Watkins, Ste. 200  
   Phoenix, AZ 85034

8. 360 Networks (USA) Inc.  
   12101 Airport Way  
   Broomfield, CO 80021

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

10. Allcom USA  
    2151 E. Convention Ctr Way, Ste. 207-A  
    Ontario, CA 91764-4483

11. Alliance Group Services, Inc.  
    1221 Post Road East  
    Westport, CT 06880

12. Net-Tel Corporation  
    11921 Freedom Drive  
    Reston, VA 20190
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