BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS
JEFF HATCH-MILLER, CHAIRMAN
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

IN THE MATTER OF QWEST CORPORATION’S FILING OF RENEWED PRICE REGULATION PLAN

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

Docket No. T-01051B-03-0454
Docket No. T-00000D-00-0672

NOTICE OF FILING SUMMARY OF DIRECT TESTIMONY OF MARK A. DINUNZIO ON BEHALF OF COX ARIZONA TELCOM, LLC

Cox Arizona Telcom, LLC (“Cox Telcom”), through undersigned counsel, hereby files the Summary of Direct Testimony of Mark A. DiNunzio on behalf of Cox Arizona Telcom, LLC.

RESPECTFULLY SUBMITTED this 31st day of October, 2005.

COX ARIZONA TELCOM, LLC

By

Michael W. Patten
ROSHKA DEWULF AND PATTEN, PLC
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004
(602) 256-6100

ORIGINAL and 15 COPIES of the foregoing filed October 31, 2005, with:

Docket Control
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007
COPIES of the foregoing hand-delivered/mailed
October 31, 2005 to

Jane L. Rodda, Esq.
ALJ, Hearing Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

Maureen Scott, Esq.
Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

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

Timothy Berg, Esq.
Theresa Dwyer, Esq.
FENNEMORE CRAIG, PC
3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913

Norman Curtright
Qwest Communications
4041 North Central Avenue, Suite 1100
Phoenix, AZ 85012

Todd Lundy, Esq.
QWEST LAW DEPARTMENT
1801 California Street
Denver, Colorado 80202

Joan S. Burke, Esq.
OSBORN MALEDON, PA
2929 North Central Avenue, Suite 2100
Phoenix, Arizona 85012-2794

Thomas H. Campbell, Esq.
Michael T. Hallam, Esq.
LEWIS AND ROCA
40 North Central Avenue
Phoenix, Arizona 85004

Thomas F. Dixon
WORLDCOM, INC.
707 17th Street, 39th Floor
Denver, Colorado 80202
Scott S. Wakefield, Esq.
RESIDENTIAL UTILITY CONSUMER OFFICE
1110 West Washington, Suite 220
Phoenix, Arizona 85007

Peter Q. Nyce, Jr., Esq.
Regulatory Law Office
DEPARTMENT OF THE ARMY
United States Army Legal Services Agency
901 North Stuart Street
Arlington, Virginia 22203-1837

Richard Lee, Esq.
SNAVELY KING MAJOROS O’CONNOR & LEE, INC.
1220 L Street, N.W., Suite 410
Washington, D.C. 20005

Martin A. Aronson, Esq
Morrill & Aronson PLC
One East Camelback, Suite 340
Phoenix, Arizona 85012

Brian Thomas
Vice President Regulatory
Time Warner Telecom, Inc.
223 Taylor Avenue North
Seattle, Washington 98109

Albert Sterman, Vice President
Arizona Consumers Council
2849 E. 8th Street
Tucson, Arizona 85716

Walter M. Meek
Arizona Utilities Investors Association
2100 N. Central Avenue, Suite 210
Phoenix, Arizona 85004

By [Signature]
Mr. DiNunzio’s testimony is offered in support of the Settlement Agreement. Cox participated in the settlement discussion to ensure that its concerns with the revised Price Cap Plan being proposed by Qwest were addressed to its satisfaction.

Cox’s interest in the Price Cap Plan was limited to a few discrete issues. First, Cox took issue with Qwest’s proposal to establish competitive zones in which Qwest would have complete pricing flexibility. Second, Cox sought to ensure that the Price Cap Plan would include appropriate price floors to prevent predatory pricing, price squeezes or other anti-competitive behavior. Third, Cox did not support Qwest’s request for $64 million from the Arizona Universal Service Fund ("AUSF"), particularly in light of the impact on: (i) the size of the fund, (ii) the entire overall structure of the funding mechanism of the AUSF and (iii) Arizona consumers. The settlement agreement addressed Cox’s concerns regarding the Price Cap Plan. Cox did not take a position on Qwest’s revenue requirement, rate base or depreciation rates.

Cox believes that the settlement agreement is in the public interest and should be approved. It resolves important issues in a manner that benefits Arizona consumers without protracted litigation.