BEFORE THE ARIZONA CORPORATION COMMISSION

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CHAIRMAN
WILLIAM A. MUNDELL
COMMISSIONER
MARC SPITZER
COMMISSIONER
MIKE GLEASON
COMMISSIONER
KRISTIN K. MAYES
COMMISSIONER

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

DOCKET NO. T-01051B-03-0454

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

DOCKET NO. T-00000D-00-0672

NOTICE OF FILING

The Residential Utility Consumer Office ("RUCO") submits the following page 7 that was inadvertently left out of RUCO's Post–Hearing Brief (Non-Proprietary Version) pertaining to the above-referenced Dockets, which was filed on December 2, 2005.

RESPECTFULLY SUBMITTED this 6th day of December, 2005.

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RURO has broken down Qwest's market share by wire center for both residential and business lines. See RURO-11 Schedules 4 and 5 attached hereto. Begin Confidential End Confidential.

Another explanation frequently relied on by the Parties to explain Qwest's loss of revenues and the increasing competitive market Qwest faces is wireless service. RURO-11 at 137; S-5 at 24-25. Qwest does not provide wireless service. Regardless of the perception, the available evidence suggests that wireless and wire line services are not close substitutes. RURO-11 at 138. Most people purchase both services, using the mobile phone in situations where it will function best and the conventional phone where it functions best. Id. The fact that most people keep both phones shows that wireless and wire line services should not be viewed as competitive alternatives. Moreover, Qwest has not shown that significant numbers of wireless customers disconnect their wire line service upon subscription to a wireless service. Id. at 138. Since wire line and wireless services are not functional equivalents and there is no quantitative evidence to suggest otherwise, the Commission should give little weight to this argument.

In sum, the Commission needs to take a comprehensive look at geographic pricing and consider how it fits into the competitive landscape. As competition continues to intensify in Arizona, the Commission should not retain a rate averaging approach merely because to properly address geographic pricing would be cumbersome. The Commission should reject the Settlement and send this matter back to hearing.

2) ARIZONA UNIVERSAL SERVICE FUND (AUSF)

RURO recognizes that the subject docket is not the place to have a comprehensive discussion or review of the AUSF. However, it is appropriate to discuss the AUSF in this