COMMENTS ON PROPOSED PROTECTIVE ORDER AND PROCEDURAL RECOMMENDATION
ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION

As set forth in the December 19, 2008, Procedural Order in the above-captioned dockets, the Arizona Local Exchange Carriers Association ("ALECA") hereby submits (i) its comments on the Staff's proposed protective order, and (ii) its procedural recommendations.

I. COMMENTS ON STAFF'S PROTECTIVE ORDER

ALECA has no objections to the form of Staff's proposed Protective Order.

II. PROCEDURAL RECOMMENDATIONS

ALECA recommends that the Commission begin with a workshop process. At the first workshop, the parties would be tasked with identifying all remaining issues in these dockets. Then, at a second workshop, the parties would attempt to resolve or narrow these issues. At the end of the second workshop, the parties would provide a consensus status report to the Administrative Law Judge.

ALECA expects that the process will require additional workshops following the second workshop. At the completion of the workshop process, the parties would provide a final
consensus status report to the Administrative Law Judge, who would then set any remaining issues for hearing.

Respectfully submitted on January 22, 2009, by:

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