BEFORE THE ARIZONA CORPORATION COMMISSION

CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

IN THE MATTER OF THE GENERIC INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.’S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS.

DOCKET NO. T-00000A-00-0194

U S WEST COMMUNICATIONS, INC.’S COMMENTS REGARDING THE SCOPE OF THIS PROCEEDING

Pursuant to the Commission’s Procedural Order dated March 30, 2000, U S WEST Communications, Inc. submits the following comments regarding the scope of this proceeding. U S WEST proposes the following:

1. There should be only two phases to this proceeding. In the first phase, the Commission should address deaveraging of the existing wholesale rates. In the second phase, the Commission should address the rates for linesharing and for new network elements identified in the FCC’s Third Report and Order. The Commission could also address matters raised by FCC orders issued since the initial cost docket. Since cost studies will have to be prepared, it will be necessary to identify the issues to be covered in the second phase. Accordingly, U S WEST proposes that there be a procedural conference after the Phase I hearing to identify the issues to be covered in Phase II.

2. The issues raised by the remand from the United States District Court in U S WEST v. Jennings, 46 F. Supp.2d 1004
(D. Ariz. May 5, 1999), should be addressed in the Commission docket that was created for that matter. Since a different group of parties appeared in that proceeding, inclusion of the remand issues in this proceeding would lead to unnecessary confusion and inefficiency.

3. Issues relating to the SGAT other than those related to the 271 Docket should be addressed in the SGAT docket that has already been created. Inclusion of matters relating to the SGAT in the instant docket would also lead to confusion and inefficiency.

The division of issues among dockets described above will allow for the handling of all issues that need to be addressed while also maximizing administrative efficiency.

RESPECTFULLY SUBMITTED this 24th day of April, 2000.

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