The Arizona Corporation Commission ("Commission" or "ACC") Staff hereby requests an Order by the Hearing Officer directing U S WEST Communications, Inc. ("U S WEST") to supplement the record in this case with three additional exhibits. Staff believes that this additional information would be useful to the Hearing Officer and the parties in further evaluating the various proposals in this case. Since all of this information should be readily available to the Company, Staff requests that the Company be directed to provide it by Thursday of this week so parties can consider the information in their briefs.

Staff believes the following additional information is necessary for a proper evaluation of the Company’s case. First, Staff would like to see the Loop Mod’s breakdown of average loop costs by wirecenter. It was Staff’s understanding that U S WEST Witness Million indicated at the hearing that such information was available. Second, the Company should be directed to supply the workpapers from the Loop Mod showing the aggregation of loop costs per wire center grouping (very small, small, medium and large). Finally, the Company should supply the breakdown of lines per individual wire center falling within the BRA and each of the two Zones. Staff believes that this information is important to determine the overall reasonableness of the Company’s proposal, even on an interim basis.

Staff believes that this information should be readily available and will be useful to the Hearing Officer and other parties. Given the expedited timeframe for Phase I of this proceeding,
and the availability of only one week between the filing of direct and responsive testimony, Staff believes that good cause exists for granting its Motion. Staff respectfully requests that an expedited procedural conference be scheduled to discuss its Motion.

RESPECTFULLY submitted this 16th day of May, 2000.

[Signature]

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