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

COX ARIZONA TELCOM’S DISAGREEMENT WITH JOINT PRICE SCHEDULE

Cox Arizona Telcom, L.L.C. (“Cox”) disagrees with two prices on the joint price list submitted on March 29, 2002: Intrabuilding Cable and On Premises Wire (on page 5 of 10 of the Price List). Cox agrees that the two prices should be same, as contemplated by the Recommended Opinion and Order (“ROO”). Cox does not agree, however, that the parties agreed to the $1.19 price for both items. The $1.19 is the price calculated by Qwest’s Loop Mod model. Because the ROO adopts the HAI Model, Cox believes that the appropriate price for each item is the On Premises Wire price set forth in Mr. Hydock’s Revised Exhibit MH1 (attached as part of AT&T/WorldCom Ex. 15) as potentially modified pursuant to the ROO findings. That price is the HAI Model equivalent to the Qwest LoopMod’s “Intrabuilding Cable” price and is consistent with the position that Cox took in this proceeding and recommended to the Commission for adoption. Alternatively, the Commission should adopt Staff’s pricing proposal for Intrabuilding Cable set forth in Appendix A to Staff’s Initial Post-Hearing Brief (again, as potentially modified pursuant to the ROO).
Dated: April 1, 2002.

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