ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION
REPLY TO QWEST MOTION TO EXPAND SCOPE
AND PROCEDURAL RECOMMENDATION

("ALECA") hereby (i) replies to Qwest's July 27 Motion to expand the scope of these
dockets to examine certain contracts, and (ii) supports AT&T's August 10, 2009, procedural
recommendations in these dockets.

I. REPLY TO QWEST'S JULY 27 MOTION

In its Motion, Qwest asks that the Commission: “include in this investigation contracts
that many CLECs have entered into with selected IXCs, providing for intrastate switched access
rates that are below the tariff rates those CLECs have filed with the Commission.” Qwest’s
Motion should be denied.

Qwest has provided no reason to include its requested investigation in these dockets. The
above-captioned dockets relate to reforming the Arizona Universal Service Fund rules and
intrastate-access charges. Qwest has shown no nexus between its request and the scope of these
dockets. Further, expanding these dockets to address Qwest's new issue would delay the case,
which is finally moving forward after many years. Finally, Qwest would not be prejudiced by
denying its Motion; it can simply file a complaint with the Commission concerning the issues.

II.  PROCEDURAL RECOMMENDATIONS

ALECA supports AT&T’s August 10, 2009, procedural recommendations in these
dockets.

Respectfully submitted on September 9, 2009, by:

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