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BEFORE THE ARIZONA CORPORATION COMMISSION

MARC SPITZER
Chairman
WILLIAM MUNDELL
Commissioner
JEFF HATCH-MILLER
Commissioner
MIKE GLEASON
Commissioner
KRISTIN MAYES
Commissioner

Arizona Corporation Commission
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DOCUMENT CONTROL

IN THE MATTER OF QWEST CORPORATION'S FILING AMENDED RENEWED PRICE REGULATION PLAN	DOCKET NO. T-01051B-03-0454
IN THE MATTER OF THE INVESTIGATION OF THE COST OF TELECOMMUNICATIONS ACCESS	DOCKET NO. T-00000D-00-0672 **NOTICE OF ERRATA**

Qwest Corporation ("Qwest") hereby files this Notice of Errata in the above-referenced dockets. On May 20, 2004, Qwest filed its Direct Testimony for Modification of Price Cap Plan, Request for Deregulation of Services and Request for Arizona Universal Service Funding. As a part of that filing, Qwest inadvertently omitted exhibit HMS-1, the curriculum vitae of Harry M. (Chip) Shooshan III. A copy of this attachment is enclosed and will be mailed to each person identified on the service list in these dockets.

RESPECTFULLY SUBMITTED this 13 day of July, 2004.

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STRATEGIC POLICY RESEARCH

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Docket No. T-01051B-03-0454
Docket No. T-00000D-00-0672
Qwest Corporation
Exhibit HMS-1
May 20, 2004

HARRY M. (CHIP) SHOOSHAN III

Received a B.A. *magna cum laude* from Harvard University in Government and a J.D. from Georgetown University Law Center.

Before co-founding Strategic Policy Research, Inc. ("SPR"), Mr. Shooshan served for eleven years on Capitol Hill. He was chief counsel and staff director of what is now the Subcommittee on Telecommunications and the Internet of the U.S. House of Representatives and was active in congressional efforts to reform the nation's communications laws.

Mr. Shooshan specializes in communications public policy analysis, regulatory reform and the impact of new technology and competition. He also advises on business strategies and market opportunities.

Mr. Shooshan is the author of numerous studies and articles dealing with various aspects of the video marketplace, including the transition to digital television and the impact of the Internet. He is one of the nation's leading authorities on telecommunications infrastructure and its relationship to economic development and to the global competitiveness of U.S. businesses.

Mr. Shooshan coordinates SPR's telecommunications and electronic mass media practice in Europe and has advised clients in the United Kingdom, Canada and the Caribbean.

Mr. Shooshan has testified before several congressional committees, before the Federal Communications Commission ("FCC") and numerous state commissions. He has also testified as an expert witness in litigation concerning broadcasting, cable and wireless cable, and in proceedings before the Copyright Arbitration Royalty Panel concerning satellite broadcasting.

From 1978 to 1991, he was an adjunct professor of law at Georgetown University Law Center, teaching regulation and communications law.

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GEORGETOWN UNIVERSITY LAW CENTER
J.D., Communications Law, 1975

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B.A., Government, *magna cum laude*, 1968

EMPLOYMENT

	STRATEGIC POLICY RESEARCH, INC.—Bethesda, Maryland
1992-Present	*Principal.* Telecommunications and public policy consulting services for a variety of clients in the telecommunications industry.
	NATIONAL ECONOMIC RESEARCH ASSOCIATES, INC.—Washington, D.C.
1989-1992	*Vice President.* Telecommunications and public policy consulting services for a variety of clients in the telecommunications industry.
	SHOOSHAN & JACKSON INC—Washington, D.C.
1980-1989	*Principal.* Telecommunications and public policy consulting services for a variety of clients in the telecommunications industry.
	SUBCOMMITTEE ON COMMUNICATIONS, INTERSTATE AND FOREIGN COMMERCE COMMITTEE, U.S. HOUSE OF REPRESENTATIVES—Washington, D.C.
1975-1980	*Chief Counsel/Staff Director.* Legislative, oversight and investigating activities relating to telecommunications.
	SUBCOMMITTEE ON COMMUNICATIONS AND POWER, INTERSTATE AND FOREIGN COMMERCE COMMITTEE, U.S. HOUSE OF REPRESENTATIVES—Washington, D.C.
1974-1975	*Staff Director.* Legislative, oversight and investigating activities relating to telecommunications and energy.
	U.S. HOUSE OF REPRESENTATIVES—Washington, D.C.
1969-1974	*Administrative Assistant to the Honorable Torbert H. Macdonald.* Legislative and political coordination and support.

PROFESSIONAL ACTIVITIES

Member, Federal Communications Bar Association.

TESTIMONIES

Rebuttal Testimony on behalf of SBC Indiana. Before the Indiana Utility Regulatory Commission. *In the Matter of the Indiana Utility Regulatory Commission's Investigations of Matters Related to the Federal Communications Commission's Report and Order on Remand and Further Notice of Proposed Rulemaking in CC Docket Nos. 01-338, 96-98, and 98-147.* Cause No. 42500. April 12, 2004.

Testimony on behalf of SBC Texas. Before the Public Utility Commission of Texas. *Impairment Analysis of Local Circuit Switching for the Mass Market.* Docket No. 28607. **Direct**: February 9, 2004. **Rebuttal**: March 19, 2004.

Testimony on behalf of SBC Michigan. Before the Michigan Public Service Commission. Docket No. U-13796. **Direct**: December 19, 2003. **Reply**: February 10, 2004. **Response**: March 5, 2004.

Testimony on behalf of SBC Illinois. Before the Illinois Commerce Commission. Docket No. 03-0595. SBC Illinois Exhibit 3.0. **Direct**: December 2, 2003. **Rebuttal**: February 24, 2004. **Surrebuttal**: March 3, 2004.

Direct Testimony on behalf of Qwest Iowa. Before the Department of Commerce, Utilities Board. Docket No. INU-03-01. February 25, 2004.

Testimony on behalf of Qwest Corporation. Before the Washington Utilities and Transportation Commission. *In the Matter of the Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order.* Docket No. UT-033044. **Direct**: December 22, 2003. **Responsive**: February 2, 2004. **Rebuttal**: February 20, 2004.

Direct Testimony on behalf of Qwest New Mexico. Before the New Mexico Public Regulation Commission. *In the Matter of Implementation of a Batch Hot Cut Process and In the Matter of Impairment in Access to Local Circuit Switching for Mass Market Customers.* Case Nos. 03-00403-UT and 03-00404-UT. February 16, 2004.

Direct Testimony on behalf of SBC Ohio. Before the Public Utilities Commission of Ohio. Docket No. 04-34-TP-COI. February 10, 2004.

Direct Testimony on behalf of Qwest Corporation. Before the Public Utilities Commission of the State of Colorado. *Regarding the Unbundling Obligations of*

Incumbent Local Exchange Carriers Pursuant to the Triennial Review Order—Initial Commission Review, Docket No. 031-478T. January 26, 2004.

Testimony on behalf of SBC California. Before the California Public Utilities Commission. *Order Institution Rulemaking on the Commission's Own Motion into Competition for Local Exchange Service.* Docket Nos. 95-04-043, I.95-04-044. SBC California Exhibit 2.0. **Direct**: December 12, 2003. **Rebuttal**: January 16, 2004.

Direct Testimony on behalf of Qwest Corporation. Before the Arizona Corporation Commission. *In the Matter of ILEC Unbundling Obligations as a Result of the Federal Communications Commission Triennial Review Order.* Docket No. T-00000A-03-0369. January 9, 2004.

Testimony on behalf of Southern New England Telephone Company. Before the Department of Public Utility Control of the State of Connecticut. Docket No. 03-09-01 PH01, *DPUC Implementation of the Federal Communications Commission's Triennial Review Order—Trigger Analysis.* **Direct**: December 2, 2003. **Rebuttal**: January 9, 2004.

Expert Report on behalf of Qwest Corporation. Before the American Arbitration Association, *New Access Communications LLC, Choicetel LLC and Emergent Communications LLC, Claimants, vs. Qwest Corporation, Respondent.* January 6, 2004.

Statement of Position and Exhibits on behalf of Qwest Corporation. Before the State of Iowa, Department of Commerce—Utilities Board. Docket No. INU-03-04. November 14, 2003.

Testimony on behalf of Qwest Corporation. Before the Washington Utilities and Transportation Commission. *Request for Competitive Classification of Basic Business Exchange Telecommunications Services.* Docket No. UT-030614. **Direct**: July 1, 2003. **Rebuttal**: August 29, 2003.

Testimony on behalf of Qwest Corporation. Before the Idaho Public Utilities Commission. *In the Matter of the Application of Qwest Corporation for Price Deregulation of Basic Local Exchange Services.* Case No. QWE-T-02-25, PUC 01-010P. **Direct**: December 17, 2002. **Rebuttal**: April 21, 2003.

Testimony on behalf of Qwest Corporation. Before the Arizona Corporation Commission. *In the Matter of Qwest Corporation's Compliance with Section 252(e) of the Telecommunications Act of 1996.* Docket No. RT-00000F-02-0271. March 7, 2003.

Rebuttal Testimony on behalf of Qwest Corporation. Before the Public Service Commission of Utah. *In the Matter of the Petition of Qwest Corporation for Declaratory Ruling or, in the Alternative, for Approval of the Sale of the Utah Assets of Qwest Dex, Inc.* Docket No. 02-049-76. February 17, 2003.

Rebuttal testimony on behalf of Qwest Corporation. *In the Matter of the Nebraska Public Service Commission, on its own Motion Seeking to Conduct an Investigation of Intrastate Access Charges for Rural ILECs.* Application No. NUSF-28. September 4, 2002.

Testimony on behalf of BellSouth Telecommunications, Inc. Before the North Carolina Utilities Commission. Docket No. P-55, Sub 1013. July 16, 2002.

Testimony on behalf of Qwest Corporation. Before the Arizona Corporation Commission in Docket No. T-00000D-00-0672. *Investigation of the Cost of Telecommunications Access.* June 28, 2002.

Testimony on behalf of Qwest Corporation. Before the Arizona Corporation Commission. *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, Phase II. April 11, 2002.

Testimony on behalf of Ameritech Indiana. Before the Indiana Utility Regulatory Commission in Cause No. 41998. *In the Matter of: Petition of Comptel, Ascent, AT&T Communications of Indiana, GP, TCG Indianapolis, and McLeodUSA Telecommunications Services, Incorporated for an Investigation into the Structural Separation of Indiana Bell Telephone Company, d/b/a Ameritech Indiana.* **Responsive**: January 24, 2002. **Reply**: March 22, 2002.

Testimony on behalf of Verizon-NJ (formerly Bell Atlantic-NJ). Before the New Jersey Board of Public Utilities in Docket No. TO01020095, *I/M/O the Application of Verizon New Jersey Inc. For Approval (i) of a New Plan for an Alternative Form of Regulation and (ii) to Reclassify Multi-Line Rate Regulated Business Services as Competitive Services, and Compliance Filing.* Direct, February 15, 2001. Rebuttal Panel Testimony with William E. Taylor and Joseph H. Weber, June 15, 2001.

Testimony on behalf of Verizon-PA (formerly Bell Atlantic-PA). Before the Pennsylvania Public Utility Commission in Docket No. M-00001353 (Structural Separation). **Direct**: June 26, 2000. **Rebuttal:** October 30, 2000.

Testimony on behalf of the Staff of the Arizona Corporation Commission. Before the Arizona Corporation Commission. *In the Matter of the Application of US West Communications, Inc., a Colorado Corporation, for a Hearing to Determine the Earnings of the Company, the Fair Value of the Company for Ratemaking Purposes, to Fix a Just and Reasonable Rate of Return Thereon and to Approve Rate Schedules Designed to Develop Such Return.* Docket No. T-1051B-99-105. **Direct**, August 9, 2000. **Surrebuttal:** September 8, 2000. **Direct in Support of the Proposed Agreement:** October 27, 2000. **Supplemental Rebuttal**: November 20, 2000.

Testimony on behalf of Bell Atlantic–New Jersey. Before the Board of Public Utilities in New Jersey, BPU Docket No. TO99120934. **Direct:** May 17, 2000. **Rebuttal:** September 8, 2000.

Testimony on behalf of Ameritech Illinois. Before the Illinois Commerce Commission in Docket No. 98-0860. **Direct**, Ameritech Illinois Ex. 5.0: March 12, 1999. **Rebuttal**, Ameritech Illinois Ex. 5.1 (Shooshan): March 1, 2000. **Surrebuttal**, Ameritech Illinois Ex. 5.2 (Shooshan): April 26, 2000.

With John Haring. *Statement of John Haring and Harry M. Shooshan.* Prepared on behalf of the Real Access Alliance. Before the Subcommittee on the Constitution of the House Judiciary Committee. March 21, 2000.

Testimony before House Public Utilities Committee, General Assembly of Ohio on Substitution House Bill 314 on behalf of Ameritech Ohio. April 12, 2000.

The Benefits of Open Access: Consumer Control, Lower Prices, Expanded Investment and New Jobs. Testimony on behalf of the OpenNET Coalition. Presented before the House Committee on Consumer Affairs of the General Assembly of Pennsylvania. Hearing on House Bill No. 1516. Harrisburg, Pennsylvania. December 14, 1999.

Testimony on "open access" before the City Council. Buffalo, New York. October 28, 1999.

With Peggy L. Rettle and Joseph H. Weber. Affidavit filed on behalf of Minnesota Telephone Association. CC Docket No. 98-1. March 6, 1998. *Response to State of Minnesota Reply Comments*. December 22, 1998.

Expert Report (*Exclusivity Over Competition: The Consequences for Minnesota*), filed on behalf of Minnesota Telephone Association in *Minnesota Equal Access Network Services, Inc. et al. v. State of Minnesota, et al.* Minnesota District Court, Second Judicial District. November 3, 1998.

Direct testimony on behalf of Bell Atlantic—Pennsylvania, Inc., *For a Determination that Provision of Business Telecommunications Services Is a Competitive Service Under Chapter 30 of the Public Utility Code*. CC Docket No. P-00971307. February 12, 1998.

Testimony before the Library of Congress, United States Copyright Office, Copyright Arbitration Royalty Panel. Presented on behalf of the Satellite Broadcasting & Communications Association. *In the Matter of 1996 Satellite Carrier Royalty Rate Adjustment Proceeding*, Docket No. 96-3 CARP-SRA. December 2, 1996.

Testimony before the Committee on Commerce, Science, and Transportation, U.S. Senate. Regarding FCC Oversight and Reform. March 19, 1996.

Testimony before the Office of the King County (Washington) Hearing Examiner. *In the Matter of Renewal of King County Television Franchises of TCI*

Cablevision of Washington, Inc. On behalf of King County Office of the Prosecuting Attorney. July 14, 1995.

Testimony before the Alabama Public Service Commission. On behalf of BellSouth Telecommunications, Inc., d/b/a South Central Bell Telephone Company. Docket No. 24472. June 14, 1995.

Testimony in *Turner Broadcasting System, Inc., et al., Plaintiffs, v. Federal Communications Commission, et al., Defendants*. United States District Court for the District of Columbia. Docket No. C.A. No. 92-2247 (and related cases C.A. Nos. 92-2292, 92-2494, 92-2495, 92-2558) (TPJ). Expert's Report, April 21, 1995; Expert Declaration filed May 25, 1995.

With Calvin Monson. Testimony before the Tennessee Public Service Commission, Inquiry for Telecommunications Rulemaking Regarding Competition in the Local Exchange, Docket No. 94-00184. On behalf of BellSouth Telecommunications, Inc., d/b/a South Central Bell Telephone Company. June 17 and August 17-18, 1994.

Testimony before the Tennessee State Senate re: Senate Bill 2758 concerning local competition. March 29, 1994.

Testimony regarding the significant competition for services offered by local exchange carriers before the Louisiana Public Service Commission. On behalf of BellSouth Telecommunications, Inc. d/b/a South Central Bell Telephone Company. Docket No. U-17949-D. January 31, 1994 and September 21, 1994.

With John Haring. Testimony re: competitive safeguards. Before the Canadian Radio-television and Telecommunications Commission. On behalf of Sprint Canada in connection with Telecom Public Notice CRTC 92-78, Review of Regulatory Framework. November 25, 1993.

With Jeffrey H. Rohlfs. *Evidence of Strategic Policy Research, Inc.* Before the Canadian Radio-television and Telecommunications Commission. Prepared for Call-Net Telecommunications, Ltd. in connection with Bell Canada, General Increase in Rates, 1993. May 10, 1993.

Direct testimony on behalf of Central Telephone Company of Illinois. Before the Illinois Commerce Commission in Docket No. 92-0211, Implementation of Section 13-507 of the Public Utilities Act, as amended by P.A. 87-856. April 19, 1993.

With John Haring. Submission to the Canadian Radio-television and Telecommunications Commission. Prepared for Call-Net Telecommunications, Ltd. in connection with Telecom Public Notice CRTC 92-78, Review of Regulatory Framework. April 13, 1993.

With John Haring and Jeffrey H. Rohlfs. *Efficient Regulation of Basic-Tier Cable Rates*. Expert Report prepared for the National Association of Broadcasters in

connection with the FCC's rulemaking proceeding on cable rate regulation (MM Docket No. 92-266). January 26, 1993.

Expert testimony on cable and wireless cable markets on behalf of Microband Corporation of America and TA Associates in *SI Stern, James Simon and Beta Communications, Inc. v. MDS Acquisition Corporation, Microband Corporation of America and TA Associates*, 87 Civ. 4505 (RJW) (U.S. District Court, SDNY). November 18, 1992.

Statement on S. 1200 (The Communications Competitiveness and Infrastructure Modernization Act). Before the Subcommittee on Communications, Committee on Commerce, Science and Transportation, U.S. Senate, Washington, D.C. February 28, 1992.

Affidavit, "An Analysis of 'A Staff Proposal for the Regulation of Large Local Exchange Telephone Companies'." Prepared at the request of the Ohio Telephone Association. January 7, 1992.

Testimony regarding: "Alternatives to Rate-of-Return Regulation: Regulatory Modernization in the States." Before the Senate Select Committee on Telecommunications Infrastructure and Technology, Senate of the State of Ohio. Columbus, Ohio. April 25, 1991.

Statement regarding the telecommunications infrastructure before the Senate Select Committee on Telecommunications Infrastructure and Technology, Senate of the State of Ohio. Columbus, Ohio. February 28, 1991.

Testimony on the economics of the financial interest and syndication rules. Before the FCC on behalf of Fox Broadcasting Company, en banc hearing *In the Matter of Evaluation of the Syndication and Financial Interest Rules*, MM Docket No. 90-162. December 14, 1990.

Testimony on the importance of network modernization and on the benefits of the "Intelligent Network." Before the New York Public Service Commission on behalf of New York Telephone Company. August 1, 1990.

Statement on "Media Ownership: Diversity and Concentration." Before the Subcommittee on Communications. U.S. Senate. June 21, 1989.

Testimony regarding the "Fairness Doctrine." Before the FCC. 1984.

Statement on the Telecommunications Act of 1981. Before the Subcommittee on Telecommunications, Consumer Protection and Finance. U.S. House of Representatives. March 10, 1982.

Statement on "Diversity of Information Sources." Before the Subcommittee on Telecommunications, Consumer Protection and Finance. U.S. House of Representatives. September 15, 1981.

PUBLICATIONS

Comments of Harry M. Shooshan. Submitted to the Independent Television Commission ("ITC") in Its Review of the Programme Supply Market. United Kingdom. October 25, 2002.

With John Haring and Jeffrey H. Rohlfs. *Propelling the Broadband Bandwagon.* Prepared for the United Kingdom Office of Telecommunications and the Office of the e-Envoy. Released September 4, 2002.

With John Haring, Margaret L. Rettle and Jeffrey H. Rohlfs. *UNE Prices and Telecommunications Investment. Ex Parte* filing before the FCC. July 17, 2002.

With John Haring, Jeffrey Rohlfs and Joseph Weber. *Intercarrier Compensation to Promote Efficiency of the Local Telecommunications Sector.* Filed before the FCC on behalf of BellSouth Corporation. June 3, 2002.

With John Haring and Jeffrey H. Rohlfs. *The AT&T/Comcast Merger: All Pain and No Gain. Ex Parte* filing before the FCC. June 7, 2002.

With John Haring and Jeffrey H. Rohlfs. *Anticompetitive Effects of the Proposed AT&T Comcast Merger.* Prepared on behalf of Qwest Communications International, Inc. for submission before the FCC. April 29, 2002.

With John Haring. *Reorienting Regulation: Toward a More Facilities-Friendly Local Competition Policy.* Before the FCC, *In the Matter of Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers; Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Deployment of Wireline Services Offering Advanced Telecommunications Capability* in CC Docket Nos. 01-338; 96-98 and 98-147. Attachment A to *Comments of Qwest Communications International Inc.* April 5, 2002.

With John Haring. "Broadband policy developments in the United States. *Oftel News.* Issue No. 55. March 2002.

With John Haring. *ILEC Non-Dominance in the Provision of Retail Broadband Services.* Before the Federal Communications Commission, *In the Matter of Review of Regulatory Requirements for Incumbent LEC Broadband Telecommunications Services.* CC Docket No. 01-337. Attachment A to *Comments of Qwest Communications International Inc.* March 1, 2002.

With John Haring and Jeffrey H. Rohlfs. *And Now...But First: Propelling the Broadband Bandwagon.* Prepared for the U.K. Office of Telecommunications and Office of the E-Envoy. March 15, 2002.

With John Haring and Kirsten M. Pehrsson. *White Paper on Elimination of the Spectrum Cap.* Before the Federal Communications Commission ("FCC"), *In the Matter of 2000 Biennial Regulatory Review—Spectrum Aggregation Limits for*

Commercial Mobile Radio Services (WT Docket No. 01-14). Attachment to *Comments of Cingular Wireless LLC.* April 13, 2001. *SPR Reply to Certain Spectrum Cap Comments.* Attachment to *Reply Comments of Cingular Wireless LLC.* May 14, 2001.

With Arturo Briceño, John Haring and Jeffrey H. Rohlfs. *The Internet and the New Economy.* March 29, 2001.

With Martin Cave. "Media and Telecoms Regulation in Converging Markets." Chapter 4, The Regulatory Challenge, in *e-britannia: the communications revolution.* University of Luton Press. Copyright © 2000.

With Peter Temin. "Telecommunications in the 20th Century." Prepared for *Telecom and Electronic Media Industry Insights.* February 23, 2000.

With Joseph H. Weber and Peter Temin. *MaCable.com: Closed v. Open Models for the Broadband Internet.* Prepared for the OpenNET Coalition. October 15, 1999.

With John Haring and Margaret L. Rettle. *Economic Analysis of the FCC's Proposed Policy of "Forced Access" for CLECs to Private Buildings.* Prepared for the Real Access Alliance [a coalition of national real estate industry associations] for submission before the FCC in WT Docket No. 99-217 and CC Docket No. 96-98. August 27, 1999.

With John Haring. *LPFM: The Threat to Consumer Welfare.* Prepared on behalf of the National Association of Broadcasters for submission before the FCC, *In the Matter of Creation of a Low Power Radio Service*, MM. Docket No. 99-25 and RM-9208, RM-9242. August 2, 1999. [Included as Appendix C to *Comments of the National Association of Broadcasters.*]

"A Modest Proposal for Restructuring the Federal Communications Commission." *Federal Communications Law Journal.* May 1998.

With John Haring. *Local Telecommunications Competition and Deregulation: Assessing the U.S. Model.* Prepared for the *30th Annual Conference of the Institute of Public Utilities.* Williamsburg, Virginia. December 10, 1998.

With John Haring. *The Emperor's New Clothes: Regulation without a Rationale.* Prepared for submission before the FCC, *In the Matter of 1998 Biennial Regulatory Review—Review of the Commission's Broadcast Owner ship Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996*, MM Docket No. 98-35. *Joint Comments of Fox Television Stations, Inc. and USA Broadcasting, Inc.*, Attachment A. July 21, 1998.

"The Argument for a One-Person FCC." *Legal Times.* June 15, 1998.

"Wireless as Competitor: An Unconventional View." *Wireless Week.* June 8, 1998.

With John Haring. *Cutting the Gordian Knot of Rate Rebalancing*. Prepared for the *29th Annual Conference of the Institute of Public Utilities, "Reconciling Competition and Regulation."* Williamsburg, Virginia. December 5, 1997.

With John Haring, Calvin S. Monson and Jeffrey H. Rohlfs. *Replacing Competitive Bans with Competitive Safeguards: The Role of Imputation.* Prepared for BellSouth. October 15, 1997.

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