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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

DOCKETED

IN THE MATTER OF U S WEST  
COMMUNICATION, INC.'S COMPLIANCE  
WITH SECTION 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

SEP 29 1999

DOCKETED BY [Signature]

**RUCO'S COMMENTS ON PROPOSED TECHNICAL ADVISORY GROUP**

The Residential Utility Consumer Office ("RUCO") respectfully submits its comments on the proposed addition of a Technical Advisory Group ("TAG") to the Master Test Plan prepared by the Arizona Corporation Commission's ("Commission") consultant, Doherty & Company, Inc.

At the last OSS workshop on September 20, 1999, numerous parties called for, and discussed, the formation of a TAG. In its comments dated September 17, 1999 and in comments made at the OSS working group on September 20, 1999, AT&T also expressed its opinion that a TAG needed to be formed. According to AT&T, the TAG would be chartered in the Master Test Plan to provide technical oversight and guidance to the Commission, the Pseudo-CLEC, and the Third-Party Consultant. TAG members would be responsible for, among other things, providing technical assistance in test planning and execution as well as defining high-level test scenarios.

In comments made at the September 20, 1999 OSS working group, AT&T stated that RUCO should be included in the TAG. RUCO has no objection to the formation of a TAG. While it is willing to participate in any way that it can in the entire collaborative process, RUCO,

1 unfortunately, does not have the luxury of in-house, technical staff capable of actively and  
2 meaningfully contributing to a TAG.

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4 RESPECTFULLY SUBMITTED this 29th day of September, 1999.

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9 AN ORIGINAL AND TEN COPIES  
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