

COVER SHEET



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INTERVENTION ARIZONA CORPORATION COMMISS. DOCKET CONTROL CENTER

CASE/COMPANY NAME:

Arizona Payphone Association

RECEIVED ARIZONA CORPORATION COMMISSION

DOCKETED

DOCKET NO.

-00000B-97-0238

FEB 25 3 55 PM '99

D/B/A or RESPONDENT:

FEB 25 1999

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NATURE OF ACTION OR DESCRIPTION OF DOCUMENT

Please mark the item that describes the nature of the case/filing:

01 UTILITIES - NEW APPLICATIONS

- NEW CC&N, RATES, INTERIM RATES, CANCELLATION OF CC&N, DELETION OF CC&N (TERRITORY), EXTENSION OF CC&N (TERRITORY), TARIFF - NEW (NEXT OPEN MEETING), REQUEST FOR ARBITRATION (Telecommunication Act), FULLY OR PARTIALLY ARBITRATED INTERCONNECTION AGREEMENT (Telecom. Act.), VOLUNTARY INTERCONNECTION AGREEMENT (Telecom. Act), MAIN EXTENSION, CONTRACT/AGREEMENTS, COMPLAINT (Formal), RULE VARIANCE/WAIVER REQUEST, SITING COMMITTEE CASE, SMALL WATER COMPANY -SURCHARGE (Senate Bill 1252), SALE OF ASSETS & TRANSFER OF OWNERSHIP, SALE OF ASSETS & CANCELLATION OF CC&N, FUEL ADJUSTER/PGA, MERGER, FINANCING, MISCELLANEOUS Specify

02 UTILITIES - REVISIONS/AMENDMENTS TO PENDING OR APPROVED MATTERS

- APPLICATION, COMPANY, DOCKET NO., TARIFF, PROMOTIONAL, DECISION NO., DOCKET NO., COMPLIANCE, DECISION NO., DOCKET NO.

SECURITIES or MISCELLANEOUS FILINGS

- 04 AFFIDAVIT, 12 EXCEPTIONS, 18 REQUEST FOR INTERVENTION (marked with X), 48 REQUEST FOR HEARING, 24 OPPOSITION, 50 COMPLIANCE ITEM FOR APPROVAL, 32 TESTIMONY, 30 COMMENTS, 29 STIPULATION, 38 NOTICE OF INTENT (Only notification of future action/no action necessary), 43 PETITION, 46 NOTICE OF LIMITED APPEARANCE, 39 OTHER Specify

2-25-99

Date

Raymond S. Heyman, Esq

Print Name of Applicant/Company/Contact person/Respondent/Atty. 256-6100

Phone

PLEASE SEE NOTICE ON REVERSE SIDE

BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN

Commissioner - Chairman

TONY WEST

Commissioner

CARL J. KUNASEK

Commissioner

IN THE MATTER OF US WEST) DOCKET NO. T-00000B-97-0238
COMMUNICATIONS, INC.'S COMPLIANCE)
WITH § 271 OF THE TELECOMMUNICATIONS) ARIZONA PAYPHONE
ACT OF 1996.) ASSOCIATION'S MOTION TO
) INTERVENE

The Arizona Payphone Association ("APA"), pursuant to A.A.C. R14-3-105 hereby moves to intervene in the above-captioned proceeding. In support hereof, APA states as follows:

1. APA's members represent over 5,000 independently owned telephones in Arizona. APA's members presently purchase or receive local exchange services from US West. APA's members also compete with US West to the extent it (or its affiliates or subsidiaries) maintains pay telephones in Arizona.

2. Further, should US West become an interLATA carrier, APA's members may purchase interLATA services from US West, and US West interLATA services may be required to be available from APA's members' pay telephones.

3. APA seeks to participate in these proceedings to ensure US West's compliance with all Arizona and Federal requirements as it enters into an additional telecommunications market.

4. APA's participation in this proceeding will not unduly broaden the nature or scope of this proceeding.

5. No other party or intervenor can represent the interests of APA's members as adequately and specifically as APA.

ROSHKA HEYMAN & DEWULF, PLC
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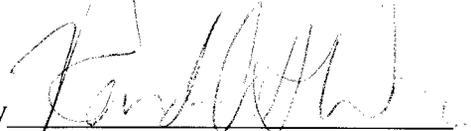
6. Service of all correspondence, documents or pleadings should be made to counsel for the APA as follows:

Raymond S. Heyman, Esq.
Randall H. Warner, Esq.
Roshka Heyman & DeWulf
Two Arizona Center
400 N. Fifth Street, Suite 1000
Phoenix, Arizona 85004

WHEREFORE, for all of the foregoing reasons, the Arizona Payphone Association respectfully requests that the Commission issue its order granting this Motion to Intervene.

RESPECTFULLY SUBMITTED this 25th day of February, 1999.

ROSHKA HEYMAN & DEWULF, PLC

By 

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1 **Original and ten copies of the foregoing**
2 **filed this 25th day of February, 1999, with:**

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 **Copy of the foregoing hand-delivered**
8 **this 25th day of February, 1999, to:**

9 Jerry L. Rudibaugh, Chief Hearing Officer
10 Hearing Division
11 Arizona Corporation Commission
12 1200 West Washington Street
13 Phoenix, Arizona 85007

14 Paul Bullis, Chief Counsel
15 Legal Division
16 Arizona Corporation Commission
17 1200 West Washington Street
18 Phoenix, Arizona 85007

19 Ray Williamson, Acting Director
20 Utilities Division
21 Arizona Corporation Commission
22 1200 West Washington Street
23 Phoenix, Arizona 85007

24 **Copies of the foregoing sent via U.S. Mail**
25 **this 25th day of February, 1999, to:**

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