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As stated in the Commission's May 27, 1997 procedural order, the time frames imposed in this case by the Telecommunications Act of 1996 are short. *5/27/97 Procedural Order*, para. 4. For this reason, all parties must be permitted to review and take discovery on U S WEST's complete application during the full 90-day period preceding U S WEST's FCC filing. U S WEST should not be permitted to file an unsupported, skeletal application, rely on that application, and effectively prevent discovery by other parties in the case.

Therefore, AT&T will respond to U S WEST's First Set of Discovery Requests only after the Commission has ruled on the pending Joint Motion to Reject U S WEST's Notice filing or after U S WEST has complied with the existing procedural order by filing its full and complete application.¹

DATED this 23rd day of February, 1999.

**AT&T COMMUNICATIONS OF
THE MOUNTAIN STATES, INC.**

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¹ In the event U S WEST files its full and complete application, AT&T hereby reserves the right to object to any and all discovery requests listed in U S WEST's First Set of Data Requests.

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1 ORIGINAL AND TEN COPIES of the foregoing
2 hand-delivered for filing on February 23, 1999, to:

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

7 ONE COPY of the foregoing
8 hand-delivered on February 23, 1999, to:

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

15 COPY of the foregoing mailed on February
16 23, 1999, to:

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