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BEFORE THE ARIZONA CORPORATION COMMISSION

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CARL J. KUNASEK
CHAIRMAN
JAMES M. IRVIN
COMMISSIONER
RENZ D. JENNINGS
COMMISSIONER

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IN THE MATTER OF THE APPLICATION)	DOCKET NO. U-0000-97-238
OF U S WEST COMMUNICATIONS, INC.'S)	
COMPLIANCE WITH §271 OF THE)	U S WEST COMMUNICATIONS,
TELECOMMUNICATIONS ACT OF 1996)	INC.'S RESPONSE TO AT&T
)	COMMUNICATIONS OF THE
)	MOUNTAIN STATES, INC.'S
)	ADDITIONS TO MAY 27, 1997
)	PROCEDURAL ORDER

U S WEST Communications, Inc. ("U S WEST"), by its undersigned counsel, hereby responds to the additions proposed by AT&T Communications of the Mountain States, Inc. ("AT&T") to the Procedural Order released on May 27, 1997 by the Arizona Corporation Commission (the "Commission") in the above-captioned proceeding.

I. ATTACHMENT B

AT&T has proposed that the Commission add six items to the list of questions contained in Attachment B to its May 27 Order. There are two points to be made with respect to the proposed additional items.

First, while the first three items purport to concern whether U S WEST has sufficient "capacity for providing resold services and network elements," they in fact ask U S WEST to make apples-and-oranges comparisons that are hard to understand and are probably of little value. For example, AT&T apparently wants

1 U S WEST to compare the number of "orders for resold services and
2 unbundled loops" processed in a day with the "volumes of orders
3 that it can process for its own retail customers in a day." Not
4 only does that ask U S WEST to compare what it actually processes
5 for the competitive local exchange carriers ("CLECs") with what
6 it "can process" for its retail customer - an inapt comparison
7 providing no helpful information - but it also seeks a comparison
8 between two sets of orders that are not comparable, since U S
9 WEST does not receive orders for "resold services and unbundled
10 loops" to its retail customers. Providing the aggregate numbers
11 of orders processed for different checklist items is not
12 objectionable; making comparisons of items that yield no
13 meaningful data is unnecessary and serves no useful purpose.

14 Second, the second three items, addressing "future capacity
15 for providing resold services and network elements," all deal
16 with the capability of U S WEST to meet CLECs "future forecasted
17 demands." These items highlight how critical it is for U S WEST
18 and the Commission to receive untimely and accurate CLEC
19 forecasts of their levels of demand for U S WEST resold services
20 and elements. To date, such forecasts have not been forthcoming.
21 U S WEST can hardly be expected to spend money on maintaining
22 unused capacity to cover future demand that may never
23 materialize. The Commission should condition any requirement
24 that U S WEST provide information on its ability to meet "future
25 capacity" on the CLECs first having shared with U S WEST accurate
26 demand forecasts.

1 II. HEARING ON U S WEST SECTION 271 APPLICATION

2 AT&T requests that the Commission hold a hearing on U S
3 WEST's Section 271 submissions. If the Commission believes that
4 a hearing would help it in fulfilling its obligation to evaluate
5 U S WEST's checklist compliance and report thereon to the FCC,
6 U S WEST has no objection to having such a hearing.

7 DATED this 26th day of June, 1997.

8 U S WEST LAW DEPARTMENT
9 Norton Cutler
10 AND
11 FENNEMORE CRAIG, P.C.

12 By 
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19 Attorneys for U S WEST
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21 ORIGINAL and ten copies of
22 the foregoing hand-delivered
23 for filing this 26th day of
24 June, 1997, to:

25 Arizona Corporation Commission
26 Docket Control
1200 West Washington Street
Phoenix, Arizona 85007

COPIES of the foregoing hand
delivered this 26th day of June, 1997, to:

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