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MISSION

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RECEIVED  
AZ CORP COMMISSION

DOCKET NO. 00000B-97-0238

MAR 3 12 19 99

SE/COMPANY NAME:

In the Matter of US West Communications  
Inc.'s Compliance with Section 271  
of the Telecommunications Act of 1996

DOCUMENT CONTROL

/A: \_\_\_\_\_

**NATURE OF ACTION OR DESCRIPTION OF DOCUMENT** Please mark the item that describes the nature of the case/filing:

**01 NEW APPLICATIONS**

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

**02 REVISIONS/AMENDMENTS TO  
PENDING OR APPROVED MATTERS**

APPLICATION  
COMPANY \_\_\_\_\_  
DOCKET NO. \_\_\_\_\_

TARIFF  
PROMOTIONAL  
DECISION NO. \_\_\_\_\_  
DOCKET NO. \_\_\_\_\_  
COMPLIANCE  
DECISION NO. \_\_\_\_\_  
DOCKET NO. \_\_\_\_\_

Arizona Corporation Commission

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**MISCELLANEOUS FILINGS**

- |                          |                                 |                                     |   |
|--------------------------|---------------------------------|-------------------------------------|---|
| <input type="checkbox"/> | 04 AFFIDAVIT                    | <input type="checkbox"/>            | 29 STIPULATION  |
| <input type="checkbox"/> | 12 EXCEPTION                    | <input type="checkbox"/>            | 38 NOTICE OF INTENT<br>(Only notification of future action/no action necessary)   |
| <input type="checkbox"/> | 18 REQUEST FOR INTERVENTION     | <input type="checkbox"/>            | 43 PETITION   |
| <input type="checkbox"/> | 48 REQUEST FOR HEARING          | <input type="checkbox"/>            | 46 NOTICE OF LIMITED APPEARANCE   |
| <input type="checkbox"/> | 24 OPPOSITION                   | <input checked="" type="checkbox"/> | 39 OTHER<br>Specify <u>ACI's Objections to US West's<br/>First Set of Data Requests and Motion t<br/>Stay Discovery</u> |
| <input type="checkbox"/> | 50 COMPLIANCE ITEM FOR APPROVAL |                                     |   |

DATED: 3/2/99

Thomas H. Campbell, LEWIS AND ROCA,

Print Name of Applicant/Company/contact person  
Attorneys for ACI

PLEASE SEE NOTICE ON REVERSE SIDE

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RECEIVED  
AZ CORP COMMISSION  
Mar 3 12 19 PM '99

DOCUMENT CONTROL

BEFORE THE ARIZONA CORPORATION COMMISSION

JIM IRVIN,  
CHAIRMAN

CARL KUNASEK,  
COMMISSIONER

TONY WEST,  
COMMISSIONER

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

Docket #T-00000B-97-0238

**ACI CORP. d/b/a  
ACCELERATED  
COMMUNICATIONS, INC.'S  
OBJECTIONS TO US WEST'S  
FIRST SET OF DATA  
REQUESTS AND MOTION TO  
STAY DISCOVERY**

ACI Corp. d/b/a Accelerated Connections, Inc. ("ACI") objects to the First Set of Data Requests served upon ACI by US West Communications, Inc. ("US West") on or about February 22, 1999. US West has directed ACI to respond to the data requests within 10 days from February 22, 1999.

On February 8, 1999, US West filed its 271 Notice of Intent with the Arizona Corporation Commission (the "Commission"). On February 16, 1999, a group of competitive local exchange carriers ("CLECs") filed a joint motion to reject US West's 271 Notice of Intent. That motion asserts that US West has failed to comply with the Commission's procedural requirements set forth in Decision No. 60218 issued May 17, 1997, as amended by the June 16, 1998 procedural order, and that the Commission should not allow US West to unilaterally modify the Commission's procedural requirements.

1 ACI objects to responding to these First Data Requests as directed by US West until  
2 the Commission has ruled upon the joint motion to reject US West's 271 filing. ACI  
3 requests that US West's First Data Requests to ACI be stayed and that ACI not be required  
4 to respond to the data requests until the Commission has acted upon the joint motion to  
5 reject. ACI reserves the right to make any other objections to the First Data Requests and  
6 to apply for a protective order.

7 WHEREFORE, ACI respectfully requests that the Commission grant this objection  
8 and motion and stay these First Data Requests to ACI.

9 DATED this 3<sup>rd</sup> day of March, 1999.

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LEWIS AND ROCA



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Attorneys for ACI Corp. d/b/a Accelerated  
Communications, Inc.

1 ORIGINAL and TEN  
2 copies of the foregoing  
3 filed this 3<sup>rd</sup> day of March,  
4 1999, at:

5 Arizona Corporation Commission  
6 Utilities Division – Docket Control  
7 1200 W. Washington Street  
8 Phoenix, Arizona 85007

9 COPY of the foregoing hand-  
10 delivered this 3<sup>rd</sup> day of March, 1999,  
11 to:

12 Paul Bullis, Chief Counsel  
13 Legal Division  
14 Arizona Corporation Commission  
15 1200 W. Washington Street  
16 Phoenix, Arizona 85007

17 Acting Director, Ray Williamson  
18 Utilities Division  
19 Arizona Corporation Commission  
20 1200 W. Washington Street  
21 Phoenix, Arizona 85007

22 COPY of the foregoing mailed  
23 this 3<sup>rd</sup> day of March, 1999, to:

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