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26 February 1999

Charles W. Steese
US West Communications, Inc.
1801 California Street, Suite 5100
Denver, CO 80202

Arizona Corporation Commission
DOCKETED

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DOCKETED BY	<i>mj</i>
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RE: US West Communications, Inc.'s Compliance with Section 271 of the
Telecommunications Act of 1996, Docket No. U-0000-97-238, T00000A-
97-0238

Dear Mr. Steese:

Enclosed is the *Response of the Telecommunications Resellers Association to US West's
First Set of Data Requests* in the above-captioned proceeding.

Questions may be directed to me.

Sincerely,

TELECOMMUNICATIONS RESELLERS ASSOCIATION

Andrew O. Isar
Andrew O. Isar

Enclosures

cc: Service List

BEFORE THE
ARIZONA CORPORATION COMMISSION

IN RE: US WEST COMMUNICATIONS)
INC'S COMPLIANCE WITH SECTION)
271 OF THE TELECOMMUNICATION ACT)
OF 1996)
_____)

Docket No: U-0000-97-238
T00000A-97-0238

**RESPONSES OF THE TELECOMMUNICATIONS RESELLERS ASSOCIATION
TO US WEST'S FIRST SET OF DATA REQUESTS**

The Telecommunications Resellers Association ("TRA") hereby responds to US West Communications Inc's ("US West") First Set of Data Requests To Telecommunications Resellers Association, as follows:

REQUEST NO. 1: Describe each complaint, problem, or concern you have relating to US West's provisioning of interconnection in accordance with the requirements of §251(c)(2) and §252(d)(1). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of interconnection. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of interconnection.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 2: Please identify each US West central office or other location in Arizona where TRA collocates or intends to collocate within the next 24 months. For each projected location where TRA intends to collocate with US West within the next 24 months,

state whether TRA intends to collocate physically or virtually, and produce all documents relating to these collocation plans.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 3: Describe each complaint, problem, or concern you have relating to US West's provisioning of non-discriminatory access to poles, ducts, conduits, and rights of way that US West owns or controls. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of poles, ducts, conduits, and rights of way. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of poles, ducts, conduits, and rights of way.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 4: Describe each complaint, problem, or concern you have relating to US West's provisioning of local loop transmission from the central office to the customer's premises, unbundled from local switching or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of unbundled local loop transmission. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of local loop transmission from the central office to the customer's premises, unbundled from local switching or other services.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 5: Describe each complaint, problem, or concern you have relating to US West's provisioning of local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services. Produce all documents

reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of unbundled local transport. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 6: Describe each complaint, problem, or concern you have relating to US West's provisioning of local switching unbundled from local transport, local loop transmission, or other services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of unbundled local switching. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of local switching unbundled from transport, local loop transmission, or other services.

RESPONSE: See Response to Request No. 1.

REQUEST NO 7: Describe each complaint, problem, or concern you have relating to US West's provisioning of nondiscriminatory access to 911 or E911 services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of 911 and E911 services.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 8: Describe each complaint, problem, or concern you have relating to US West's provisioning of directory assistance services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of directory assistance services.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 9: Describe each complaint, problem, or concern you have relating to US West's provisioning of operator call completion services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of these services. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of operator call completion services.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 10: Describe each complaint, problem, or concern you have relating to US West's provisioning of white pages directory listings for customers of other carriers' telephone exchange services. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of white pages directory listings. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of white pages directory listings for customers of other carriers' telephone exchange services.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 11: Describe each complaint, problem, or concern you have relating to US West's provisioning of nondiscriminatory access to databases and associated signaling necessary for call routing and call completion. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of databases and associated signaling. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of nondiscriminatory access to databases and associated signaling necessary for call completion.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 12: Describe each complaint, problem, or concern you have relating to US West's provisioning of interim and/or long-term number portability. Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of interim and/or long-term number portability. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of interim and/or long-term number portability.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 13: Describe each complaint, problem, or concern you have relating to the availability from US West of reciprocal compensation arrangements in accordance with the requirements of §252(d)(1). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to the reciprocal compensation arrangements that US West's provides. This request also includes, but is not

limited to, any documents containing positive or favorable statements, comments or analyses about the reciprocal arrangements that US West provides or makes available.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 14: Describe each complaint, problem, or concern you have relating to US West's provisioning of telecommunications services available for resale in accordance with the requirements of §251(c)(4) and §252(d)(3). Produce all documents reflecting or relating to any of these complaints, problems, or concerns and all documents relating in any way to US West's provisioning of telecommunications services available for resale. This request also includes, but is not limited to, any documents containing positive or favorable statements, comments or analyses about US West's provisioning of telecommunications services available for resale.

RESPONSE: See Response to Request No. 1.

REQUEST NO. 15: Please identify all entities other than US West, including TRA itself, from which TRA has obtained, or can obtain, for use in Arizona or in any of the other 13 states in US West's region any of the following elements, items, or services: (1) local loops; (2) network interface devices; (3) local switching; (4) interoffice transmission facilities; (5) vertical features; (6) directory assistance; and (7) operator services. Produce all documents that relate to your ability to obtain such elements, items, or services for use in Arizona or in any of the other 13 states in US West's region.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West or any other telecommunications service provider. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 16: Please produce all documents reflecting, referring, or relating to any analysis by TRA concerning: (1) whether the quality of any local telecommunications service TRA provides in Arizona or in the other 13 states in US West's region is or may be affected by the ability to obtain from US West any of the elements, items, or services listed in the preceding data request; and (2) whether the ability to obtain from US West any of the elements, items, or services listed in the preceding data request is necessary for TRA to provide local telecommunications service in Arizona or in any of the other 13 state in US West's region.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 17: For Arizona and the other 13 states in US West's region, please describe on a state-specific basis TRA's projected demand over the next 24 months for the following elements, items, and services that TRA expects to obtain from US West: (1) interconnection; (2) access to poles, ducts, conduits, and rights of way; (3) local loop transmission from the central office to the customer's premises, unbundled from local switching or other services; (4) local transport from the trunk side of the wireline local exchange carrier switch, unbundled from switching or other services; (5) local switching unbundled from transport, local loop transmission, or other services; (6) vertical features; (7) access to 911 and E911 services; (8) directory assistance services; (9) operator call completion services; (10) white pages directory listings; (11) access to databases and associated signaling necessary for call routing and call completion; (12) interim and/or long-term number portability; (13)

telecommunications services available for resale. Produce all documents that reflect, refer, or relate to TRA's projected demand for these elements, items, and services.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA projects that it will have no demand whatsoever for the elements, items, and services listed in the preceding interrogatory within the next 24 months.

REQUEST NO. 18: Does TRA have a real-time operation support system that TRA's service representative use to place customer service requests, local service request or any other request that TRA uses to order local telecommunications product or services? If so, for Arizona and the other 13 state in US West's region, provide the name of the system(s), the products and services the system(s) support(s), the date the system(s) was deployed, and the data, functional message, and transport protocols used for the system(s). Produce all documents that refer to, reflect, or relate to the products and services the system(s) supports, the date the system(s) was deployed, and/or the data, functional message, and transport protocols used for the system(s).

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a real-time operation support system and does not anticipate having a real-time operation support system at any time in the future.

REQUEST NO. 19: If TRA does not have an ordering system of the type described in the previous data request, please state all mechanisms, manual and otherwise, it uses to support the negotiation and ordering process for its local exchange customers, and state the functionality, provided by each of the mechanisms. Produce all documents that describe, define, outline, or otherwise explain these mechanisms, including but not limited to documents that describe or otherwise reflect the functionality that each mechanism provides.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA has no local exchange customers. TRA does not have any mechanisms, manual or otherwise, to support ordering and negotiation processes.

REQUEST NO. 20: Does TRA follow any specific development, implementation, and testing guidelines when it develops OSS software for use in the local exchange market? If so, produce all documents containing the guidelines that TRA follows, or, if the guidelines are not written, describe them.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not develop or use OSS software and does not anticipate developing or using OSS software at any time in the future.

REQUEST NO. 21: For Arizona and the other 13 states in US West's region, please state whether there have been errors in local service request ("LSRs") or orders that TRA has submitted to US West. If TRA maintains any such data, describe the nature of the information you maintain, and produce all documents that reflect, refer, or relate to any occurrences of errors in LSRs or orders that TRA has submitted to US West.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. TRA has not submitted any LSRs to US West and does not anticipate submitting LSRs to US West at any time in the future.

REQUEST NO. 22: Identify each electronic interface TRA requires to provide local service in Arizona and the other 13 states in US West's region for the purpose of obtaining access to US West's pre-ordering, ordering, provisioning, billing, and maintenance and repair systems. For each interface that TRA identifies, please provide the following: (1) identify each

interface that TRA believes is not available from US West; (2) if the interface is available and TRA contends it is inadequate, describe in detail each concern that TRA has about the adequacy of US West's interface; (3) the date TRA requires the interface to be made available from US West for testing by TRA; and (4) when TRA intends to begin using the interface to provide local exchange service in Arizona and the other 13 states in US West's region. Produce all documents that relate to any of the responses that TRA provides to this data request.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. As TRA does not provide local service, TRA does not require an electronic interface for local service.

REQUEST NO. 23: If TRA contends that other ILECs are meeting any of TRA's electronic interface needs relating to local exchange services, unbundled network elements, or any other aspect of local service, identify the ILEC(s), describe the system(s) or interface(s) the ILEC(s) is using, and provide the name of a contact person at the ILEC(s) who is familiar with the system. Produce all documents that discuss, describe, or otherwise explain and/or discuss the capabilities of any such system(s) or interface(s).

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West, or any other ILEC. TRA has no electronic interface needs, rendering the remainder of the foregoing interrogatory moot.

REQUEST NO. 24: On average, how many electronic interface orders for some form of local exchange service has TRA place with ILECs per day over the past year? Please provide a breakdown by state, ILEC, and order type of all electronic interface orders TRA has placed with ILECs during the past year. Produce all documents that demonstrate, reflect, or refer

to the number and/or type of electronic interface orders for local exchange service that TRA has placed with ILECs in the past year, including but not limited to documents containing breakdowns of this information by state, ILEC, and order type.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not place electronic interface orders with US West or any other ILEC, and has no plans to do so at any time in the future.

REQUEST NO. 25: Has TRA used any ILEC's graphical user interface ("GUI") or human-to-computer interface that supports local exchange service in any local telecommunications market in the United States within the past 24 months? If so, please identify each interface TRA has used, the ILEC who provides the interface, and the market in which TRA used the interface. If TRA has used a GUI or human-to-computer interface within the past 24 months, produce all documents that discuss, describe, or otherwise explain the interface(s) it has used, the ILEC who provides the interface(s) and/or the market in which TRA used the interface(s).

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West, and has no specific first hand documentation or data relating to the preceding data request. TRA has not used any GUI or human-to-computer interface within the last 24 months.

REQUEST NO. 26: For each facilities-based, local telecommunications service that TRA provides in any of the states in US West's region, describe all provisioning commitments or representations that TRA gives to its customers, including but not limited to: (1) the average, anticipated time interval for installing the services; and (2) the average, anticipated amount of time the customer will be out of service to allow for a change of carriers

through a loop cut-over. State whether the provisioning commitments or representations that TRA provides vary at all depending on whether TRA is using facilities provided by US West or facilities provided by some other source. Produce all documents that reflect, refer to, or relate to any provisioning commitments or representations that TRA provides to its customers for each such facilities-based, local telecommunications service that TRA provides in US West's region.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 27: Produce copies of all documents relating to presentations, marketing materials, sales efforts and related materials that TRA representatives use in their discussions with local exchange customers or in mass marketing of customers to promote or sell any local telecommunications service in US West's region, including, but not limited to, written scripts and other prepared presentations.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 28: Please state whether TRA measures or tracks in any way the time per call that its local service sales and marketing representative spend on the telephone with customers to promote or sell TRA's local telecommunications services and to arrange for provisioning services. If TRA does measure or track the time for these calls, describe the nature of the information it records, and produce all documents that contain, refer, or relate to data of this type for all states in US West's region.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 29: Please state the hours of operation for TRA's local exchange units or office in Arizona and in the other 13 states in US West's region, and produce documents that show the hours of operations for these units or offices.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA therefore has no local exchange units or offices within Arizona. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 30: Please provide the following information for all states in US West's region for all local telecommunications services that TRA provides using only its own facilities: (1) the percentage of customer commitments met for provisioning and repairs; (2) the percentage of held orders; (3) the percentages of network blockage that TRA is experiencing, both in its network and outside of its network; and (4) the average repair intervals. Please provide the same information requested above for all states in US West's region for all local telecommunications services that TRA provides using any facilities provided by US West. Produce all documents that contain, refer, or relate to any such performance results for both instances where TRA uses US West's facilities and instances where it uses exclusively its own facilities for Arizona and the other 13 states in US West's region.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 31: Within US West's region, does TRA measure or track the frequency with which its local service sales and marketing representatives contact local exchange customers who have pending orders to notify them of the receipt of or changes to: (1) order rejection notices; (2) firm order confirmation notices; (3) completion notices; and (4) jeopardy notices? If TRA does measure or track this information, describe the nature of the information it records, and produce all documents that contain, refer, or relate to data of this type for all states in US West's region. In addition, please produce any documents that reflect TRA's policies and procedures data for informing its local exchange customers of receipt of or changes to the notices listed in this data request and/or summarizes, discusses or otherwise explains such performance data.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 32: On a sustained basis, without the use of temporary support from other groups within TRA, what is the absolute number of local service requests and orders that TRA is presently capable of issuing, by interface type, on a business day basis (e.g., LSRs and orders per business day)? Please provide an attestation of the individual that is furnishing this information, and produce all documents that support, refer, or relate to the number of LSRs and orders that TRA is capable of issuing per business day.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 33: For Arizona and the other 13 states in US West's region, please provide: (1) the projected number of local service requests and orders per business day that TRA expects to place with US West, by interface type, over the next 24 months; and (2) the total projected demand from TRA for all pre-order transactions, by quarter, over the next 24 months. Produce all documents that reflect, support, or relate to these projections.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 34: Does TRA intend to commit, in association with US West, to the development and/or availability of a production-ready OSS EDI for pre-ordering, ordering, and maintenance and repair for residential POTS and small business? If so, when? If not, why not? Produce all documents that discuss, refer, or relate to any consideration by TRA of whether to, and/or when to develop an OSS EDI interface in association with US West, including, but not limited to, documents relating to TRA's decision in the past to terminate or suspend this type of development with US West?

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not intend to commit, and has no plans to commit in the future, in association with US West or any other ILEC, to the development and/or availability of a production-ready OSS EDI for pre-ordering, ordering, and maintenance and repair for residential POTS and small business.

REQUEST NO. 35: For each state in US West's region, please provide the number of orders for facilities-based services that TRA has submitted to any ILEC: (1) by any means, manual, or otherwise, within the past year; and (2) through an electronic interface within

the past year. Produce all documents that show the number of orders that TRA has placed through these means within the past year.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA has never submitted an order for facilities based services to any ILEC, and does not foresee submitting an order for facilities based services to any ILEC at any future date.

REQUEST NO. 36: For Arizona and the other 13 states in US West's region, project the maximum number of TRA transactions US West will be required to process on average, per day for the functions of pre-ordering, ordering, billing, and maintenance and repair over the next 24 months. Describe in detail the basis for your response, and produce all documents that reflect or relate to these projected transactions.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. US West will therefore not be required to process any TRA transactions for pre-ordering, ordering, billing, and maintenance and repair for the next 24 months.

REQUEST NO. 37: Produce all documents concerning how (i.e.: through its own facilities, unbundled network elements, resale, or combination), where and when (if at all) TRA currently plans to become a local exchange provider for Arizona. If TRA intends to become a facility-based provider in Arizona using unbundled network elements, identify the elements and the projected quantities you will need on a monthly basis from US West for each of the next 24 months, and produce all documents that reflect, refer, or relate to the these projected needs need for use in Arizona during this period.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not plan to become a local exchange provider for Arizona.

REQUEST NO. 38: Identify all towns, cities, and states in US West's region in which you anticipate initiating local service within: (A) 90 days; (B) 180 days; (C) 1 year; (D) 2 years; (E) 5 years. Produce all documents that discuss, refer, or relate to the identities of the towns, cities, and states in which you anticipate initiating local service within these time frames, including, but not limited to, all documents that reflect, refer, or relate to TRA's strategy for entering the local exchange market in US West's region by targeting select markets. This request specifically includes, but is not limited to, documents that reflect separation of cities, states, or portions of states into tiers of importance.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not anticipate providing local services in any city, town, or state within US West's region at any time within the next five years.

REQUEST NO. 39: Produce all documents created at any time from January 1, 1994, to the present that identify or discuss the states and cities where TRA has intended to serve as a local telecommunications provider, whether through resale or otherwise, including any and all documents that include rankings—by priority, importance, potential revenue or any other criteria—of states or cities for local market entry. This request includes, but is not limited to, any and all documents that reflect change in the priority that TRA has given to states and cities for local market entry. This request specifically includes, but is not limited to, documents relating to TRA's plans for entering the local exchange markets in Connecticut or in any other

state that discuss, refer, or relate to the entry of Southern New England Telephone Company ("SNET") and whether or not TRA's plans for entering Connecticut changed over time.

RESPONSE: See Response to Request No. 38.

REQUEST NO. 40: Produce any documents that discuss, refer, or relate to any analyses by TRA concerning how competition will change in Arizona's local and long distance markets if US West is authorized to compete in the interLATA market in that state.

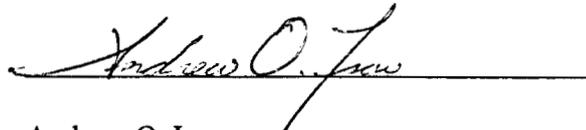
RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

REQUEST NO. 41: If TRA contends that US West is impeding in any way TRA's entry into the local exchange market in Arizona or in any of the other 13 states in US West's region, produce all documents that support, refer, or relate to that contention.

RESPONSE: TRA is an industry association, not a provider of competitive telecommunications services. TRA does not have a direct relationship with US West. Accordingly, TRA possesses no responsive first hand documentation or data.

Telecommunications Resellers Association

BY:



Andrew O. Isar
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26 February 1999

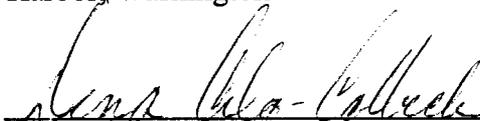
BEFORE THE
ARIZONA CORPORATION COMMISSION

IN RE: US WEST COMMUNICATIONS)
INC'S COMPLIANCE WITH SECTION) Docket No: U-0000-97-238
271 OF THE TELECOMUNICATION ACT) T00000A-97-0238
OF 1996)
_____)

CERTIFICATE OF SERVICE

I hereby certify that I have this day serve the Responses of the Telecommunications Resellers Association to US West's First Set of Data Requests was served on all parties of record in this proceeding, via Overnight Delivery or United States Mail, as noted on the following service list.

Dated this 26th Day of February, 1999 at Gig Harbor, Washington



Dena Alo-Colbeck

Original sent via Overnight Mail, Properly Addressed, Postage Prepaid to:

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