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BEFORE THE ARIZONA CORPORATION COMMISSION

AZ CORP COMMISSION

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CARL J. KUNASEK
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Arizona Corporation Commission
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IN THE MATTER OF U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH §271 OF THE TELECOMMUNICATIONS ACT OF 1996	**DOCKET NO. T-00000A-97-0238** **REPLY MEMORANDUM OF JOINT INTERVENORS AT&T, TCG-PHOENIX, MCI AND SPRINT IN SUPPORT OF THEIR MOTION TO COMPEL RESPONSES TO DATA REQUESTS JI-130, JI-131, JI-132 AND JI-133**

Joint Intervenors AT&T Communications of the Mountain States, Inc., TCG-Phoenix, MCI WorldCom, Inc. and Sprint Communications Company, L.P. (collectively, "Joint Intervenors") reply as follows in support of their motion to compel U S WEST Communication, Inc. ("U S WEST") to respond to data requests JI-130, JI-131, JI-132 and JI-133.

I. INTRODUCTION

In arguing that documents received from third party consultants are privileged, U S WEST ignores the teaching of even the cases upon which it relies. As the Montana Commission recognized, none of the privileges asserted by U S WEST protect from disclosure the underlying factual information reviewed, used or relied upon by U S WEST or any of its employees, agents or independent retained experts in connection with analyzing its operations support systems ("OSS"). The four data requests at issue in

the motion to compel seek the discovery of such underlying facts, which are critical to the analysis this Commission must undertake.

The information sought in the four data requests is critical to a review of U S WEST's OSS performance. To underscore the importance of that information, the Hearing Division should note that the Commission Staff recently retained an OSS consultant, Doherty & Company, Inc., and has propounded data requests upon U S WEST asking it to produce the very information the Joint Intervenors seek.

II. ARGUMENT

A. Attorney-Client Privilege.

U S WEST argues that Arizona's statutory attorney-client privilege precludes disclosure of three specific consultant reports and other information responsive to the four subject data requests. Contrary to U S WEST's contentions, the attorney-client privilege, as codified in Arizona, does not protect these OSS reports from disclosure. As U S WEST notes, only communications between an attorney for a corporation and "any employee, agent or member" of that corporation are privileged. Moreover, such communications are not protected unless they are made for the purpose of providing legal advice or for the purpose of obtaining information in order to provide legal service. Ariz. Rev. Stat. § 12-2234(B).

Neither the three OSS reports nor any other information prepared by the retained third party experts fall within the scope of this statute. In the first place, there is no "communication" for the purpose of obtaining legal advice at issue here. However, even if one assumes *arguendo* that the mere delivery of the OSS reports to a U S WEST attorney qualifies as a communication, the communication does not qualify under the

attorney/client privilege because it was not made by or from an employee, agent or member of U S WEST.

The consultants who made the reports here are not attorneys for U S WEST. Under the precise wording of the statutory privilege in Arizona, therefore, communications between a U S WEST attorney and the consultants could qualify for the privilege only if the consultants were "employees, members or agents" of U S WEST. In fact, they fall into none of these categories. The third party consultants certainly are not "employees" of U S WEST and U S WEST does not contend otherwise. There is no suggestion that they are "members." Finally, the three consultants are not agents of U S WEST. To the contrary, as U S WEST itself admits, it retained three independent third party consulting firms to perform investigation and study of U S WEST's OSS. Indeed, in its discussion of Ariz. R. Civ. P. 26(b)(4)(B), U S WEST appropriately characterizes the consulting firms as non-testifying consulting experts, not as agents.

Since the consultants are not employees, members or agents, the Arizona attorney-client privilege, by its terms, does not apply to bar production of the OSS reports or any other data sought in the four subject data requests. In *Granger v. Wisner*, 134 Ariz. 377, 656 P.2d 1238 (1982), the Arizona Supreme Court held that the attorney-client privilege does not apply to information or facts acquired by the attorney from non-client sources. Based on this rule, the Court stated that the privilege does not prevent a party from calling an adverse party's expert to "testify and examin[e] the expert about his or her opinions and the observations, knowledge, information and theories are based." *Id.* at 340, 656 P.2d at 1241. Under *Granger,* the three OSS reports identified in the privilege log plainly to not fall within the scope of the attorney-client privilege.

Granger squares with the conclusion reached by the New Mexico State Corporation Commission when considering the same consultant reports at issue in this proceeding. In its order of September 21, 1998 (Exhibit B to the motion to compel), the New Mexico Commission held:

> In any event, it is undisputed that the three consultant reports in questions were not prepared directly by corporate employees. They were prepared by outside third parties under contract with U S WEST. As such, the communication may not be accurately characterized as direct and privileged attorney-client communications.

In the Matter of the Investigation Concerning U S WEST Communications, Inc.'s Compliance with Section 271 (c) of the Telecommunications Act of 1996, New Mexico State Corporation Commission, Dckt. 97-106-TC, Order Relating to Outstanding Discovery Motions ("*New Mexico Order*"), ¶ 29 (September 21, 1998) (emphasis added).

U S WEST's response relies to a large extent on the conclusion of a Special Master appointed by the Montana Public Service Commission. However, U S WEST neglects to advise this Commission that the same Special Master concluded that the attorney-client privilege does not protect the disclosure of underlying facts. The Special Master stated as follows: "The attorney-client privilege protects communications, not the underlying facts. Unless protected from disclosure by other applicable rules . . . , U S WEST must respond to data request JI-018 and JI-048." In this proceeding, data request JI-130 is identical in all respects to data request JI-048 in the Montana Section 271 Proceeding. The Special Master's conclusion in Montana comports with the same conclusion reached by the New Mexico State Corporation Commission. For these reasons, this commission may properly order U S WEST to produce all factual information responsive to the four subject data requests.

B. Work-Product Doctrine.

Its long-winded protestations to the contrary, U S WEST cannot satisfy the "in anticipation of litigation" standard established by Ariz. R. Civ. P. 26(b)(3) governing the work-product doctrine. While U S WEST asserts in rather broad strokes that its affidavits support the conclusion that the OSS reports and other documents identified on the privilege log were prepared in anticipation of litigation, a more careful review of the affidavits demonstrates otherwise.

The Privilege Log makes no attempt whatsoever to demonstrate how any of the 25 documents identified were prepared in anticipation of litigation. The affidavits filed in response to the motion to compel are no more helpful. For example, the affidavit of Raymond S. Fitzsimons attempts to connect the reports to a show cause proceeding on U S WEST's OSS performance initiated by the Colorado Public Utilities Commission on September 30, 1997. (Fitzsimons Aff. ¶ 4) Yet, U S WEST never states that the primary motive behind any of the consultant reports relates to the Colorado proceeding or any other specific proceeding or litigation. U S WEST merely concludes in the most vague manner that in October 1997 it commissioned a study on the "performance of U S WEST's OSS systems for use by U S WEST counsel in defending the various lawsuits that involve this issue and in preparing for proceedings under Section 271 of the Act." (*Id.* ¶ 6) However, U S WEST does not identify these "various lawsuits" nor in fact did it rely upon any such reports in the Colorado proceeding.

U S WEST contends it commissioned yet another study in September 1997 to "evaluate issues surrounding U S WEST's OSS systems obligations and to assess any litigation risks associated with them." (Fitzsimons Aff., ¶ 10) Again, U S WEST does

not claim that this report was prepared as an aid to the Colorado proceeding or any other specific proceeding (other than unidentified "pending claims"), but merely "to assess litigation risks." This sort of in-house investigatory study does not qualify as having been prepared in anticipation of litigation. "The fact that a defendant anticipates the contingency of litigation resulting from an . . . event does not automatically qualify an 'in-house' report as work-product. . . ." *Binks. Mfg. Co. v. National Presto Indus., Inc.*, 709 F.2d 1109 (7th Cir. 1983).

But, more importantly, U S WEST's in-house counsel did not actually commission the September 1997 report. Rather, U S WEST's Information Technologies organization commissioned the analysis. As Mr. Fitzsimons states in his affidavit, "U S WEST's Information Technologies organization commissioned another analysis in September 1997 . . . they [U S WEST's Information Technologies organization] requested another consulting firm to evaluate issues surrounding U S WEST's OSS systems obligations. . . ." (Fitzsimons Affidavit, ¶ 10.) It appears that the involvement of a U S WEST attorney was tangential and intended only in an attempt to shield the documents from production. Furthermore, the fact that a U S WEST business division, and not an attorney for U S WEST, requested the study forcibly demonstrates that such activity was within the regular and ordinary course of U S WEST's ongoing compliance obligations, not in anticipation of litigation. U S WEST cannot under these circumstances legitimately claim the protection of the work-product doctrine for the September 1997 study. Indeed, U S WEST never contends that any of the reports or other documents listed in the privilege log were commissioned for or prepared in connection with any

particular litigation, notwithstanding its claim that a flurry of litigation involving OSS was pending at the time the reports were commissioned.

Because the three OSS reports and related documents were not prepared in anticipation of litigation, but rather to fulfill U S WEST's obligation to comply with the Telecommunications Act of 1996 (the "Act"), a function all Regional Bell Operating Companies are required to perform in the ordinary course of their business, the materials are not protected under the work-product doctrine.

Moreover, even if the information and documents in the four subject data requests fell within the scope of the work-product doctrine, Joint Intervenors have amply demonstrated a substantial need for the documentation and information. U S WEST argues that the Joint Intervenors' claim of lack of access and cooperation from U S WEST is ostensibly vague and unsubstantiated. Nothing could be further from the truth. U S WEST has never made its internal OSS operations available for evaluation and testing by any competing local exchange carriers since passage of the Act on February 8, 1996. Indeed, even after complaints regarding lack of access in the Nebraska, New Mexico and Montana proceedings, U S WEST has never invited Joint Intervenors or any other carriers to test U S WEST's systems.[1]

U S WEST's argument that Joint Intervenors are free to retain their own experts and to elicit from those experts whatever they can in support of its opposition to U S WEST's Section 271 compliance does not withstand analysis. For what purpose

[1] The closest U S WEST has come to allowing new entrants to have any access to U S WEST's systems was a demonstration of the IMA and EDI interfaces and U S WEST's retail processing capabilities that U S WEST presented for new entrants in connection with the Montana 271 proceeding. Access permitted during this demonstration, however, was limited to observing U S WEST representatives perform various tasks using the systems. U S WEST has never allowed new entrants access to its

would Joint Intervenors retain experts to evaluate U S WEST's OSS when U S WEST has steadfastly refused to make such systems available for review and inspection? On this very critical issue, U S WEST ignores the cogent and quite accurate observation of the New Mexico Commission:

> Only U S WEST has access to this information because only U S WEST has the data about its own operations and customer services with which to make the required comparison. Likewise, only the consultants retained by U S WEST itself would be in the position to have unfettered access to the critically important information about the services U S WEST provides itself and its own customers.
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> . . .
>
> It is impracticable if not impossible for any other party besides U S WEST to have access to the internal operations of U S WEST that must be considered before any informed conclusion can be reached about whether U S WEST is providing non-discriminatory access to its OSS operations and related services as required under Section 271.

New Mexico Order, ¶¶ 34-35.

Joint Intervenors have demonstrated a substantial need to review the OSS reports and related documents and have demonstrated that it is quite literally impossible to obtain substantially equivalent information by other means. Thus, the work product doctrine does not bar or prevent the disclosure of the OSS reports and other documents and information sought in the four subject data requests.

C. Opinion Work-Product.

U S WEST contends that the so called work product of its in-house counsel is not subject to discovery. U S WEST's contention is without merit.

The law in the area of attorney opinion work product imposes a strict burden of proof on its proponent, a burden that U S WEST has completely neglected. Whatever

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systems to conduct actual testing or analysis.

heightened protection may be conferred upon attorney opinion work product, that level of protection is not triggered unless disclosure creates a real, nonspeculative danger of revealing a lawyer's thoughts. *See In Re San Juan DuPont Plaza Hotel Fire Litigation*, 859 F.2d 1007, 1015 (1st Cir. 1988); *RTC v. Heiserman*, 151 F.R.D. 367, 375 (D. Co. 1993). Attorney work-product immunity "is not established by the simple assertion of the claim and the recitation of some magic words." *Research Institute v. Wisconsin Alumni*, 114 F.R.D. 672, 680 (W.D. Wis. 1987). In any event, an *in camera* review is the appropriate mechanism to segregate that form of work-product.

Here, U S WEST expects the Commission to accept the vague and conclusory assertions ("magic words") of U S WEST's in-house counsel to invoke attorney opinion work-product immunity. U S WEST makes absolutely no showing that disclosure of the consultant reports or any other document listed in the privilege log will create a real and nonspeculative danger of revealing the thoughts of in-house counsel. As to the October 1997 report, U S WEST offers only the following sentence: "The study and its results contain my thought processes, opinions, and conclusions regarding the requirements of the Act and issues raised in pending and anticipated litigation concerning U S WEST's OSS performance." (Fitzsimons Aff. ¶ 8.) In commenting on a similar invocation of the same immunity, the district court in *Research Institute* stated, "It is my impression that these claims were asserted with a minimum of care and discrimination. In no instance that I can recall was any meaningful explanation offered why a document was thought to contain [attorney] work-product." *Research Institute,* 114 F.R.D. at 679-80. As to the September 1997 study, U S WEST never even contends that it contains any impressions or opinions of an attorney. Moreover, as Mr. Fitzsimons himself acknowledges, he did

not in fact commission the September 1997 report. Rather, a separate internal business division of U S WEST caused that report to be prepared.

U S WEST has completely failed to establish the application of opinion work-product immunity to the consultant reports. They are properly subject to discovery in these proceedings.

D. Opinions and Conclusions of Non-Testifying Experts.

U S WEST also contends that the OSS reports are immune from discovery pursuant to Ariz. R. Civ. P. 26(b)(4)(B). U S WEST is mistaken for several reasons. First, the "in anticipation of litigation" standard applies under this rule. As previously argued, U S WEST cannot under any circumstance satisfy this standard with respect to the work-product doctrine and accordingly, has not satisfied it for purposes of Rule 26(b)(4)(B). Second, assuming *arguendo* that U S WEST could satisfy the "in anticipation of litigation" test, under Rule 26(b)(4)(B) the facts known and opinions held by non-testifying experts are discoverable upon a showing of "exceptional circumstances" under which "it is impracticable for the party seeking discovery to obtain facts or opinions on the same subject by other means." Here, the substantial need and undue hardship standard under the work-product doctrine is in practical application the same standard as the exceptional circumstances standard under 26(b)(4)(B). *See Braun v. Lorillard, Inc.*, 84 F.3d 230, 236 (7th Cir. 1996). As Joint Intervenors have previously argued, it is factually impossible for Joint Intervenors to conduct or duplicate the examination and review conditions of U S WEST's third party consultants.

E. Self-Evaluation Privilege.

In a final attempt to avoid the disclosure of these very significant OSS reports, U S WEST resorts to the self-evaluation privilege. In support, U S WEST cites to decisions from Georgia, New York, Florida and Kansas for the proposition that numerous courts have recognized the corporate self-evaluation privilege. However, no Arizona state or federal court has recognized the privilege. As one federal District Court has concluded,

> Given the vast array of inconsistent decisions on this issue, it would be an understatement to say that it is unclear whether a federal self-critical analysis privilege exists. Many courts that have applied the privilege do so only preceded by the caveat, "[e]ven if such a privilege exists . . ."

Morgan v. Union Pac. R.R. Co., 182 F.R.D. 261, 264 (N.D. Ill. 1998) (citing *Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 426 at n. 1 (9th Cir. 1992)). Because no Court in Arizona has adopted the self-evaluation privilege, this Commission should decline to apply it in these proceeding.

To the extent, however, that the Commission elects to consider the self-evaluation privilege, it cannot be applied to bar production of the OSS reports and related information. A federal district court in California has considered (and rejected) application of the privilege in the context of a dispute between telecommunications service providers in a case with striking factual similarity to these proceedings. In *T.W.A.R., Inc. v. Pacific Bell*, 145 F.R.D. 105 (N.D. Ca. 1992), plaintiffs alleged that Pacific Bell had unlawfully prevented plaintiffs from competing in the inside wire service business. Plaintiffs filed a motion to compel seeking Pacific Bell to produce all documents relating to certain access tariff filings and independent audit reports that

Pacific Bell was required to produce to the FCC. The requested documents related directly to one of the central issues in the lawsuit.

Among the responsive documents were audit reports prepared by an independent third party to certify that the company's cost allocation manual had been implemented in a manner consistent with regulatory requirements. The District Court declined to bar disclosure of the documents, holding that Pacific Bell had failed to meet the three-part test for the self-evaluation privilege articulated in *Dowling*.[2]

> The court finds it reasonable that Pacific Bell provide defendants with documents relating to FCC filings in which inside wiring is a central or significant issue, including any supporting documents that were provided to the FCC in connection with the audit required by the Joint Cost Order. Regarding Pacific Bell's assertion of the self-critical analysis privilege, the court finds that Pacific Bell has failed to meet its burden of showing either the existence or the applicability of this privilege. The court notes, first, that the privilege has not been recognized by the 9th Circuit, and second, that Pacific Bell has not established that the audit materials fall within the scope of such privilege.

T.W.A.R., 145 F.R.D. at 108.

Here, U S WEST offers absolutely no factual support to satisfy any of the factors identified in *Dowling*. U S WEST concludes that it has satisfied the factors but offers no factual or legal basis to support the conclusion. Simply saying that a privilege applies does not make it so. To the contrary, in light of the District Court's opinion in *T.W.A.R.*, it is readily apparent that the OSS reports do not fall within the scope of the self-evaluation privilege. In *T.W.A.R.*, Pacific Bell submitted independent audits to the FCC,

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[2] In that decision, the Ninth Circuit concluded that the privilege would apply only if the information resulted from a critical self analysis undertaken by the party seeking protection, there existed a strong public interest in protecting the free flow of the type of information for which protection was sought, and the information was of the type for

the substance of which went to the heart of one of the central issues in the case. Likewise, U S WEST commissioned the preparation of reports from third parties to evaluate and review its OSS. As Commission staff noted recently in a public hearing in this docket (May 25, 1998 hearing on U S WEST's motion for reconsideration), U S WEST's OSS is one of the central issues in the proceeding. Moreover, like Pacific Bell, U S WEST has not demonstrated that any of the factors identified in *Dowling* apply to the OSS reports. Accordingly, the Commission should decline to either adopt or apply the self-evaluation privilege to the OSS reports or other information sought in response to the four subject data requests.

III. CONCLUSION

Joint Intervenors request the following relief:

1. Its motion to compel should be granted as to the following data requests:

   JI-130, JI-131, JI-132, JI-133.

2. That U S WEST be ordered produce a privilege log for JI-3 within three days of entry of an order on this motion or be deemed to have waived any objections to JI-3 if it fails to do so.

3. Alternatively, should the Hearing Examiner conclude it is unable to determine whether the documents and other information U S WEST seeks to withhold from discovery do not fall within the scope of the attorney-client privilege or work-product doctrine, Joint Intervenors request the Hearing Examiner:

   A. Order U S WEST to produce the documents to the Hearing Examiner and Commission staff for inspection on an *in camera* basis; and

   B. After the *in camera* review and issuance of a staff report and recommendation ("Report") that the parties be granted leave to file written comments to the Report; and

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which information flow would be curtailed if discovery were allowed.

C. The Hearing Examiner hold oral argument before rendering its decision.

Respectfully submitted this 28 day of May, 1999.

AT&T COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND TCG PHOENIX

Andrew D. Hurwitz
Joan S. Burke
Osborn Maledon, P.A.
2929 North Central Avenue, 21st Floor
Phoenix, AZ 85012-2794
(602) 640-9000

Maria Arias-Chapleau
Richard S. Wolters
AT&T Law Department
1875 Lawrence Street, Suite 1500
Denver, CO 80202
(303) 298-6527

MCI WORLDCOM, INC., on behalf of its regulated subsidiaries
Thomas F. Dixon
MCI WorldCom, Inc.
707 17th Street, Suite 3900
Denver, CO 80202
(303) 390-6206

SPRINT COMMUNICATIONS COMPANY L.P.
Donald A. Low
Sprint Communications Company, L.P.
8140 Ward Parkway 5E
Kansas City, MO 64114
(913) 624-6865

ORIGINAL AND TEN COPIES of the foregoing
hand-delivered for filing on May 28, 1999, to:

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

ONE COPY of the foregoing
hand-delivered on May 28, 1999, to:

Mr. Jerry Rudibaugh
Chief Hearing Officer
Hearing Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

COPY of the foregoing mailed on May 28, 1999, to:

Vince C. DeGarlais
Andrew D. Crain
Charles W. Steese
U S WEST COMMUNICATIONS, INC.
1801 California Street, #5100
Denver, CO 80202

Timothy Berg
FENNEMORE CRAIG
3003 North Central Avenue, Suite 2600
Phoenix, Arizona 85012-2913
Counsel for U S WEST Communications, Inc.

Mark Dioguardi
TIFFANY AND BOSCO, P.A.
500 Dial Tower
1850 North Central Avenue
Phoenix, AZ 85004
Counsel for U S WEST COMMUNICATIONS

Donald A. Low
SPRINT COMMUNICATIONS COMPANY
8140 Ward Parkway 5E
Kansas City, MO 64114

Michael M. Grant
Todd C. Wiley
GALLAGHER AND KENNEDY
2600 North Central Avenue
Phoenix, AZ 85004-3020
Counsel for Electric Lightwave, Inc.

Penny Bewick
ELECTRIC LIGHTWAVE, INC.
4400 NE 77th Ave.
Vancouver, WA 98662

Barry Pineles
GST TELECOM, INC.
4001 Main Street
Vancouver, WA 98663

Robert Munoz
WORLDCOM, INC.
225 Bush Street, Suite 1900
San Francisco, CA 94107

Charles H. N. Kallenbach
E·SPIRE™ COMMUNICATIONS, INC.
133 National Business Parkway, Suite 200
Annapolis Junction, MD 20701

Carrington Phillip
COX COMMUNICATIONS, INC.
1400 Lake Hearn Drive, N.E.
Atlanta, GA 30319

Thomas F. Dixon
MCI TELECOMMUNICATIONS CORPORATION
707 17th Street, #3900
Denver, CO 80202

Joyce Hundley
UNITED STATES DEPT. OF JUSTICE
Antitrust Division
1401 H Street NW, Suite 8000
Washington, DC 20530

Richard M. Rindler
Morton J. Posner
SWIDLER & BERLIN, CHARTERED
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
Counsel for GST Tucson Lightwave, Inc., GST Net (AZ), Inc., and MCI WorldCom

Lex J. Smith
Michael W. Patten
BROWN & BAIN, P.A.
P. O. Box 400
Phoenix, AZ 85001-0400
Counsel for e·spire™ Communications, Inc. and Cox Arizona Telcom, Inc.

Richard Smith
Director of Regulatory Affairs
COX COMMUNICATIONS
2200 Powell Street, Suite 795
Emeryville, CA 94608

Thomas H. Campbell
LEWIS AND ROCA
40 North Central Avenue
Phoenix, AZ 85004
Counsel for MCI WorldCom, Inc. and ACI Corp. d/b/a Accelerated Connections, Inc.

Frank Paganelli
Colin Alberts
BLUMENFELD & COHEN
1615 M Street, Suite 700
Washington, D.C. 20036
Counsel for ACI Corp. dba Accelerated Connections, Inc.

Rex Knowles
NEXTLINK
111 E. Broadway, Suite 1000
Salt Lake City, UT 84111

Alaine Miller
Director, Regulatory & Public Affairs
NEXTLINK Communications
500 108th Ave. NE, Suite 2200
Bellevue, WA 98004

Daniel Waggoner
DAVIS WRIGHT TREMAINE
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688
Counsel for NEXTLINK

Steve Gibelli
RESIDENTIAL UTILITY CONSUMER OFFICE
2828 North Central Ave., #1200
Phoenix, AZ 85004

Raymond S. Heyman
Randall H. Warner
ROSHKA HEYMAN & DeWULF
Two Arizona Center
400 N. 5th Street, Suite 1000
Phoenix, AZ 85004
Counsel for Arizona Payphone Association

Annie Bazala