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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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CARL J. KUNASEK
Chairman
JAMES M. IRVIN
Commissioner
WILLIAM A. MUNDEL
Commissioner

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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
AT&T'S COMMENTS ON
BACKSLIDING/PENALTIES
WORKSHOPS**

AT&T Communications of the Mountain States, Inc., and TCG Phoenix
(collectively, "AT&T") hereby file general comments on the scheduled
backsliding/penalties workshops scheduled by the Arizona Corporation Commission
("Commission").

I. INTRODUCTION

On May 26, 2000, U S WEST Communications, Inc. ("U S WEST") and the Staff of the Commission filed a Joint Motion for Workshops on Remaining Section 271 Issues ("Motion"). In the Motion, U S WEST and Staff proposed a series of six workshops to discuss issues regarding backsliding and penalties.

In a Joint Response, AT&T; MCI WorldCom, Inc., on behalf of its regulated subsidiaries; Sprint Communications Company, L.P.; and e-spire Communications, Inc. ("Joint Movants") provided a number of reasons why the Arizona Commission should not schedule backsliding and penalties workshops, or should at least wait until the Regional Oversight Committee ("ROC") had decided whether it was going to address these issues on a regional basis. Joint Motion at 5-7.

The Hearing Office adopted the schedule of U S WEST and the Staff as set forth in their Motion. Procedural Order (June 12, 2000). Pursuant to the schedule adopted during the first telephonic workshop, U S WEST filed its proposed plan on June 30, 2000. Parties have until July 10, 2000, to respond.

II. COMMENTS

U S WEST and Staff continued to insist that the Commission order and schedule concurrent workshops on backsliding and penalties, although the Joint Movants and ELI raised resource and manpower concerns created by having to concurrently collaborate on U S WEST's operations support systems ("OSS"), OSS-related checklist items and on backsliding and penalties in multiple jurisdictions. Nevertheless, the Hearing Officer adopted U S WEST and Staff's proposal.

Ed Garvey, a Commissioner with the Minnesota Public Service Commission and Chairman of ROC, and Bob Rowe, a Commissioner with the Montana Public Service Commission and Chairman of the ROC OSS Executive Committee, have invited the 14 state commissions in U S WEST's region to participate in a regional collaborative on backsliding and penalties. According to the letter sent by Messrs. Garvey and Rowe, "[a]ssuming reasonable participation levels by the states, U S WEST has agreed to pay for new contracts between participating ROC states and the consultants currently working on the ROC OSS test. ... These efforts would run parallel to the OSS tests..."

AT&T will not devote any resources to the Arizona workshops on backsliding and penalties. This decision was not made without considerable thought. However, AT&T simply will not devote any resources to address these issues in multiple jurisdictions. AT&T will actively participate in the ROC backsliding and penalties

workshops. AT&T encourages the Arizona Commission to participate in the ROC workshops, as well.

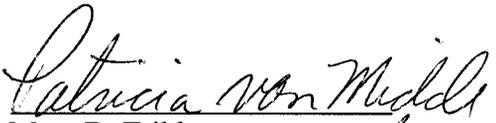
The decision by AT&T not to participate in Arizona should not be construed as agreement with, or acceptance of, any proposal submitted by U S WEST or any plan subsequently adopted by the Commission. AT&T also reserves the right to raise its concerns regarding any proposal submitted by U S WEST or any plan adopted by the Arizona Commission with the Federal Communications Commission in any proceeding initiated by U S WEST to obtain Section 271 relief in Arizona, or any other states.

III. CONCLUSION

The Arizona Commission may have a strong desire to see that U S WEST obtains Section 271 relief at the convenience of U S WEST. However, U S WEST has filed Section 271 applications in multiple jurisdictions and insists that all applications be completed concurrently and expeditiously. The resource concerns of the competitive local exchange carriers are real. AT&T's decision not to participate in backsliding and penalties workshops simply bears this out.

RESPECTFULLY SUBMITTED this 10th day of July, 2000.

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

I hereby certify that the original and 10 copies of AT&T's Comments on Backsliding/Penalties Workshops regarding Docket No. T-00000A-97-0238, were hand delivered this 10th day of July, 2000, to:

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Docket Control – Utilities Division
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