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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission
WILLIAM A. MUNDELL
CHAIRMAN
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COMMISSIONER
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DOCKETED

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AZ CORP COMMISSION
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INVESTIGATION INTO QWEST'S CABLE,
WIRE AND SERVICE TERMINATION POLICIES
AND TARIFF AND THE POLICIES AND
TARIFFS OF OTHER TELECOMMUNICATIONS
CARRIERS WITH RESPECT TO ACCESS TO
MTE/MDU TENANTS

Docket No. T-00000A-02-0280

RESPONSE COMMENTS OF
COX ARIZONA TELCOM

Cox Arizona Telcom, L.L.C. ("Cox") believes that, given the initial comments in this docket, a Commission workshop is needed to address the MDU access issues further. This workshop would be a beneficial step preceding any evidentiary hearing or rulemaking on the issues.

To begin with, there are several instances where the comments reveal areas that are ripe for discussion between the parties and Commission Staff in a constructive setting such as a workshop. First, Qwest has indicated a willingness to modify its Cable Wire and Service Termination Policy ("CWSTP") by eliminating Options 2 and 3 (which are the two most troubling options of the CWSTP). [Qwest Comments, pp. 4-5] Cox is encouraged by this position and believes it would be helpful to further discuss Qwest's asserted conditions to such modifications. Second, Cox's proposal for MDU access has evolved and no longer mandates the placement of the minimum point of entry ("MPOE") at or near the property line. [Cox Comments, pp. 1-2, 6] Rather, as set forth in its initial comments, Cox proposes that the MPOE be located and configured in such a manner as to allow ready and easy access to the MPOE. [Id.] For example, the MPOE could be located well inside

1 the MDU property, provided there is sufficient available conduit connecting the MPOE to
2 the property edge. [Id.] Indeed, this proposal is not too dissimilar from several of Qwest's
3 suggestions concerning placement of the MPOE. [See Qwest Comments, pp. 4, 6
4 (suggesting several factors could influence the best placement of the MPOE within an
5 MTE/MDU environment)] Moreover, many of Qwest's concerns are based on the
6 requirement of an MPOE at the property edge. [Id., p. 6] Those concerns may be
7 eliminated or ameliorated by Cox's modified proposal.

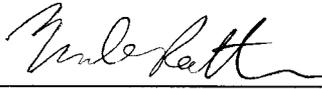
8 Furthermore, a review of the Initial Comments suggests a need to develop
9 consistent terminology to address the issues in this docket. In several instances, the
10 comments appear to use different terms for the same thing. A workshop could assist in
11 ensuring that the parties are discussing "apples and apples." Moreover, as set forth in its
12 initial comments, Cox believes that conducting field tours of different configurations of
13 MDU access facilities would greatly benefit the workshop process. At a minimum, such
14 tours would (i) help clarify key terms in the MDU access debate and (ii) assist Staff in
15 better understanding the various parties' proposed MDU access configurations.

16 Finally, Cox believes it is premature to conduct an evidentiary hearing on these
17 issues, as has been suggested by Qwest. [Qwest Comments, pp. 11-12] Again, a
18 workshop would help crystallize the issues that need to be addressed and would result in a
19 more efficient and effective hearing – to the extent a hearing is necessary.

20 In sum, Cox requests that the Commission conduct workshops, including field tours
21 of MTE/MDU entrance facilities, as the next step in addressing the issues in this docket.
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1 RESPECTFULLY SUBMITTED October 30, 2002.

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