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Arizona Corporation Commission

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AZ CORP 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-00000B-97-0238

**JOINT MOTION FOR  
WORKSHOPS ON REMAINING  
SECTION 271 ISSUES**

The Arizona Corporation Commission ("Commission" or "ACC") Staff and U S WEST Communications, Inc. ("U S WEST") respectfully submit this Joint Motion requesting that the Hearing Division enter a procedural order instituting workshops on the remaining issues in this case. The remaining issues include seven checklist items (1, 2, 4, 5, 6, 11 and 14), Section 272 issues, Track A issues, and public interest issues.

**I. BACKGROUND**

On February 8, 1999, U S WEST filed a Notice of Intent to File with the FCC and Application for Verification of Section 271(c) Compliance ("Application"), and a Motion for Immediate Implementation of Procedural Order. On March 25, 1999, U S WEST supplemented its application. The ACC issued a Procedural Order on June 8, 1999 which required parties to submit comment on appropriate Operational Support System ("OSS") standards which should be used to assess whether U S WEST meets the requirements of Section 271 pertaining to non-discriminatory access to its OSS. On the basis of responses to the June 8, 1999, Order, a second Procedural Order was issued on July 2, 1999, which initiated a series of collaborative workshops to determine the appropriate OSS performance standards for U S WEST.

By Procedural Order dated October 1, 1999, the Commission bifurcated OSS related Checklist Elements from non-OSS related Elements. The Order categorized Checklist Items 3, 7, 8, 9, 10, 12 and 13 as being non-OSS related. At the request of several parties, including the Commission Staff, the Commission, on December 8, 1999, instituted a collaborative workshop

1 process to evaluate the non-OSS Checklist Items. The December 8, 1999 Procedural Order directed  
2 the Commission Staff to conduct a series of workshops on U S WEST's compliance with Checklist  
3 Items 3, 7, 8, 9, 10, 12 and 13. Workshops on the first seven Checklist Items have now been  
4 completed and reports will soon be submitted once consensus is achieved between the parties on  
5 specific language implementing the agreements reached.

6 The December 8, 1999 Procedural Order provides that "at the conclusion of the  
7 collaborative process on the seven checklist items, the parties shall consider the use of the  
8 collaborative process to resolve the remaining checklist items." *Id.* at 3-4. Through this Joint  
9 Motion, Staff and U S WEST respectfully request that the Commission institute the same  
10 collaborative workshop process to resolve the remaining Checklist Items.

## 11 II. DISCUSSION

### 12 A. The Workshop Process Put in Place By the Hearing Division Has Been A 13 Success And Is Particularly Well Suited To Resolving the Remaining Issues 14 in This Proceeding.

14 In conjunction with U S WEST's application, the Commission is required to make  
15 a recommendation to the Federal Communications Commission ("FCC") on the following issues:

- 16 • Are the conditions of Section 271(c)(1)(A) met? That is, is a facilities-based  
17 competitor providing services to residential and business consumers within the state?
- 18 • Has U S WEST fully implemented the fourteen-item "Competitive Checklist"  
19 contained in Section 271(c)(2)(B)?
- 20 • Does U S WEST meet the requirements of Section 272?
- 21 • Will U S WEST's entry into the interLATA market be consistent with the "public  
22 interest, convenience, and necessity"?

22 The Commission's Section 271 proceeding is comprehensive in nature and is  
23 designed to fully consider all of these issues, so that the Commission can make a fully-informed  
24 recommendation to the FCC based upon a complete record. To assist it in making its determinations  
25 on these various issues, the Commission is conducting a third party independent evaluation of the  
26 access that U S WEST provides CLECs to its OSS, which is well underway. In addition to the OSS  
27 Test, the Commission is undertaking a comprehensive examination of all other Section 271 issues.

28 ...

1 This proceeding, in particular, is conducive to a collaborative workshop process  
2 because the informal dialogue that takes place in the workshop process between the parties  
3 oftentimes leads to consensus where otherwise it was believed to be impossible. Other States having  
4 completed the 271 process including Texas and New York, and States now examining these issues,  
5 including many of the thirteen States involved in the ROC collaborative process, have utilized or are  
6 utilizing a workshop process rather than the traditional contested-case procedures, and have  
7 structured their processes accordingly. The Hearing Division recognized the benefits of the  
8 collaborative workshop process when it ordered that the parties engage in a this process to develop  
9 the OSS Test and to resolve issues on the first seven checklist items. Those workshops have been  
10 very successful and have served as the basis for collaborative workshops in the other thirteen States  
11 in U S WEST's operating region.

12 Workshops have been completed covering seven of the fourteen Checklist Items that  
13 U S WEST must satisfy to provide interLATA services in Arizona. To-date, the parties appear to  
14 have reached consensus on six of the seven Checklist Items, subject to agreement on specific  
15 language changes in the U S WEST Statement of Generally Available Terms and Conditions  
16 ("SGAT") and relevant CLEC user guides. Further, the parties have considerably narrowed the  
17 disputed issues regarding the seventh Checklist Item. More specifically, the parties have reached  
18 agreement that U S WEST's compliance with the following Checklist Items is no longer in dispute,  
19 contingent upon agreement on specific language implementing the changes in some cases, and upon  
20 continued satisfactory performance measurement results:

- 21 • Checklist Item 3 – access to poles, ducts, conduits and rights-of-way,
- 22 • Checklist Item 7(i) – access to 911 and E911 services,
- 23 • Checklist Item 7(ii) – access to directory assistance services,
- 24 • Checklist Item 7(iii) – access to operator call completion services,
- 25 • Checklist Item 8 – white page directory listings,
- 26 • Checklist Item 9 – numbering administration,
- 27 • Checklist Item 10 – access to databases and associated signaling, and
- 28 • Checklist Item 12 – local dialing parity.

1 Checklist Item 13 (reciprocal compensation) could not be completely resolved.  
2 However, even with regard to this Checklist Item, the issues have been narrowed considerably and  
3 only five narrow issues remain. A complete record has been developed, and the issues have been  
4 defined for Commission resolution. The success of the workshops has been the result of hard work  
5 and the willingness of all parties to compromise. Staff believes that all parties should be  
6 commended for the degree of cooperation they have demonstrated throughout this process.

7 Because the workshop process has worked so well, the Staff and U S WEST  
8 recommend that workshops be instituted to address the remaining issues in this case. Those issues  
9 are:

- 10 • The remaining seven checklist items – checklist item 1 (interconnection), checklist  
11 item 2 (access to unbundled network elements), checklist item 4 (local loops),  
12 checklist item 5 (local transport), checklist item 6 (local switching), checklist item  
13 11 (number portability), and checklist item 14 (resale);
- 14 • Section 272 issues;
- 15 • Track A issues; and
- 16 • Public interest issues.

17 Both Staff and U S WEST believe that given the success of the first series of  
18 workshops all parties would now support use of the collaborative workshop for the remaining seven  
19 checklist items. Indeed, almost all of the same parties involved in this case are involved in the ROC  
20 collaborative process and are participating in workshops for all issues within the context of the other  
21 proceedings being conducted by other Commissions within the U S WEST operating region. In light  
22 of the success of the first round of workshops, the Commission Staff and Applicant U S WEST  
23 respectfully request that additional workshops be scheduled as set forth below to consider the  
24 remaining seven Checklist Items and the other generic Section 271 issues.

25 **B. The Process should Encompass Three Separate Series of Workshops on the**  
26 **Remaining Checklist Items, the Remaining 271 Issues Including the Public**  
27 **Interest Criterion, and Backsliding and Penalties.**

28 Staff proposes, with U S WEST's concurrence, that the process encompass three  
separate series of workshops. The first series of workshops would focus on the remaining Checklist

1 Items. The second series of workshops would include backsliding and penalty issues. The third  
2 series of workshops would include all remaining 271 issues including the public interest factor, the  
3 Track A issues and the 272 separate affiliate issues. Each of these will be discussed in more detail  
4 below.

5 The experience of the first three workshops has demonstrated that a limited number of week-  
6 long workshops will be more productive than numerous shorter workshops. Longer workshops will  
7 allow for full examination of the issues, and issues discussed in the first day or two can be resolved  
8 later in the week, or in follow-up workshops. Fewer workshops will be easier to schedule, and the  
9 parties will save travel costs.

10 Accordingly, the Staff and U S WEST suggest the following schedule<sup>1</sup> with the first two  
11 workshop series to run concurrently:

12 **First Workshop Series**

13 **Remaining Checklist Items: 1 (interconnection), 2 (access to UNEs), 4 (loops), 5 (transport),**  
14 **6 (switching) 11 (number portability) & 14 (resale) including advanced services:**

15	U S WEST to update testimony on 1, 11 and 14	June 30
16	U S WEST to update testimony on all remaining 17 Checklist items and related issues	July 21
18	CLEC Responsive Testimony (1, 11 and 14)	August 3
19	U S WEST Reply	August 10
20	Workshop	August 15-17
21	CLEC Responsive Testimony (Advanced Services, 22 Line Sharing, Sub-Loop issues, Dark Fiber and EELS)	August 21
23	U S WEST Reply	August 30
24	Workshop	Sept 5-8
25	CLEC Responsive Testimony (UNE-Combinations 26 And all Remaining Checklist Item 2 Issues (Other 27 than OSS Testing Issues), Transport and Switching)	September 21
28	U S WEST Reply	September 28
	Workshop	October 3-5

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<sup>1</sup> The following schedule contemplates expedited 5 business day discovery turn around by U S WEST.

1	CLEC Responsive Testimony (Loop)	October 20
2	U S WEST Reply	October 31
3	Workshop	November 7-9
4	Additional Workshop	November 20-21

**Second Workshop Series**

**Backsliding and Penalty Issues<sup>2</sup>**

7	Identification of Issues (telephonic workshop)	June 9
8	Workshop	July 11-12
9	Workshop	July 25-26
10	Workshop	August 22-23
11	Workshop	September 14-15
12	Workshop	October 17-18

**Third Workshops Series**

**Section 272, Track A, and Public Interest Analysis**

Testimony and Workshop Dates to be Established by Staff with the approval of the Hearing Division

This schedule attempts to balance the resource concerns of the parties with the importance of the issues to be considered. U S WEST's application has been pending before the Arizona Commission longer than most other States in the U S WEST operating region. Nonetheless, the Staff has designed the proposed schedule so that it is similar and even coincides to some degree to the schedules adopted by some other State commissions, most notably Colorado, and/or the ROC collaborative in the U S WEST region. Staff believes that this should be less burdensome overall to the parties. Staff has also attempted to avoid any conflict with the schedules of other State commission proceedings in the U S WEST operating region on these issues that have already been established. Once again, this was done to make the process less burdensome to the parties.

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<sup>2</sup> Staff will continue to monitor the ROCs' progress on these issues and will consider the results of the ROC process in its workshops if available.

1           The parties will dedicate significant resources to the workshop process, but the issues  
2 to be examined are of vital importance to all parties. The issues include whether U S WEST offers  
3 the required forms of collocation, whether U S WEST offers the required combinations of network  
4 elements, and whether U S WEST offers all required services for resale without unreasonable  
5 restrictions. The resolution of these and numerous other issues are of critical importance to the  
6 development of a competitive market in Arizona. Thus, addressing these issues as soon as possible  
7 is in the interest of CLECs, U S WEST, and Arizona consumers.

8           **1. The issues to be addressed in the first series of workshops are extremely**  
9           **important and should be addressed immediately.**

10           Staff recommends addressing all remaining Checklist Items, including advanced  
11 services, in the first series of workshops. Not all of the issues that remain to be addressed in this  
12 Section 271 proceeding are dependent upon OSS testing results. As was the case with the first seven  
13 Checklist Items, U S WEST must also demonstrate that it has “a concrete and specific legal  
14 obligation to furnish the item upon request.” Memorandum Opinion and Order, *In the Matter of*  
15 *Application of Bell Atlantic New York for Provision of In-Region, interLATA Services in New York*,  
16 FCC CC Docket No. 99-295, FCC 99-404, December 22, 1999, para. 52 (*FCC Bell Atlantic New*  
17 *York 271 Order*). In addition, U S WEST must also demonstrate that “it is currently furnishing,  
18 or is ready to furnish, the checklist item in quantities that competitors may reasonably demand and  
19 at an acceptable level of quality.” *Id.* Both of these issues can be addressed in workshops before  
20 the conclusion of the OSS Test.

21           Another issue that needs to be addressed for each Checklist Item is whether  
22 U S WEST is currently furnishing, or is ready to furnish, the Checklist Item in quantities that  
23 competitors may reasonably demand and at an acceptable level of quality. *Id.* This issue also should  
24 be addressed as soon as possible. While this issue is impacted somewhat by the outcome of the OSS  
25 Test, the parties can address all issues contingent upon the results of the OSS Test, as has been done  
26 in other States.

27 ...

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1 In addition, many issues have arisen since the commencement of this case as a result  
2 of subsequent FCC Orders. In the UNE Remand Order,<sup>3</sup> the FCC set new unbundling obligations.  
3 In its Advanced Services Orders,<sup>4</sup> the FCC established additional rules for collocation and line  
4 sharing. Any consensus reached by the parties can be incorporated into the U S WEST Wholesale  
5 Pricing Docket<sup>5</sup> which will soon be going into its second phase.

6 Both New York and Texas addressed all Section 271 issues before the conclusion of OSS  
7 testing. For example, in New York, the parties were first ordered to raise any non-OSS issues of all  
8 Checklist Items. *See*; New York Public Service Commission, *Ruling Setting Agenda for Technical*  
9 *Conferences*, Case 97-C- 0271, April 29, 1999 and *Ruling Further Detailing Agenda for Technical*  
10 *Conferences*, Case 97-C- 0271, May 26, 1999 (“We will commence with Checklist Item (i)  
11 [interconnection, one of the 7 Checklist Items with OSS implications], and parties will have the  
12 opportunity to present evidence on all non-OSS items.”); New York Public Service Commission,  
13 *Ruling Deciding Motions and Setting Schedule*, Case 97-C- 0271, June 22, 1999 (noting that the  
14 technical conference process had concluded non-OSS issues of Checklist Items (i), (ii), (v), (xi) and  
15 (xiv), all of which are among the seven checklist items impacted by OSS issues).

16 Later, but before the conclusion of OSS testing, OSS issues were addressed and resolved in  
17 the technical conference process. *See*, New York Public Service Commission, *Letter/Ruling*, Case  
18 97-C- 0271, August 3, 1999. Other commissions in U S WEST’s region, including Colorado and in  
19 Washington, have decided to address the OSS-related checklist items and other Section 271 issues  
20 before the conclusion of OSS testing.

21 The ACC should address the remaining Section 271 issues in a similar fashion. U S WEST  
22 should be ordered to present all evidence, other than results of OSS testing, that it intends to rely  
23 upon at the FCC regarding the issue. The Intervenors should then be ordered to raise all concerns

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24 <sup>3</sup> *Implementation of the Local Competition Provisions of the Local Competition Provisions of the*  
25 *Telecommunications Act of 1996*, CC Docket No. 96-98, Third Report and Order (rel. November 4, 1999) (“UNE  
Remand Order”).

26 <sup>4</sup> *In the Matter of the Deployment of Wireline Services Offering Advanced Telecommunicaitons*  
27 *Capability*, CC Docket No. 98-147, First Report and Order (rel. March 31, 1000)(“Advanced Services First Report and  
Order”); Third Report and Order (rel. December 9, 1999)(“Advanced Services Third Report and Order.”).

28 <sup>5</sup> *In the Matter of the Generic Investigation into U S WEST Communications, Inc. ’s Compliance with*  
*Certain Wholesale Pricing Requirements for Unbundled Network Elements and Resale Discounts*, ACC Docket No.  
T-00000A-00-0194.

1 and present all evidence, other than results of OSS testing that they have regarding each issue. The  
2 parties will then in the workshops address all issues other than the results of the OSS Test. Each  
3 issue can be resolved contingent upon the results of the OSS Test.

4 **2. The FCC and DOJ will likely not approve or recommend approval of**  
5 **any application without consideration of the issues to be addressed in the**  
6 **second series of workshops, backsliding and penalty issues**

7 Staff and U S WEST are recommending a second series of workshops on the  
8 backsliding and penalty issues. It is unlikely that the FCC will approve of any application without  
9 consideration and inclusion of these issues. Neither Staff or U S WEST believe that it is necessary  
10 to wait until the performance measurement audit is completed to begin consideration of these issues.

11 It is also necessary to begin these workshops at this time because of the importance  
12 and complexity of the issues raised. It is likely to take considerable time to reach consensus between  
13 the parties on these issues. Thus, Staff and U S WEST believe it is important to begin discussions  
14 immediately on these issues, so that parties are given enough time to address and come to consensus,  
15 if possible, on these issues.

16 **3. The remaining Section 271 issues are the subject of the third series of**  
17 **workshops.**

18 The remaining Section 271 issues including the public interest criterion, Section 272  
19 issues and Track A issues would comprise the third series of workshops. Staff and U S WEST do  
20 not believe that it is necessary to set dates for the submission of comments or workshops at this time.

21 Rather, Staff requests some discretion and the ability to set dates later in this process as Staff  
22 believes appropriate depending upon the progress of the other workshop series and OSS testing.

23 **C. The Experience of Other States, Including States Within the U S WEST**  
24 **Operating Region, Demonstrate that All Parties Will Benefit Through Prompt**  
25 **Resolution of These Issues Through a Collaborative Process.**

26 The experience of other States has demonstrated that the remaining Section 271  
27 issues can and should be considered before the OSS Test is concluded. Both New York and Texas  
28 addressed all Section 271 issues before the conclusion of OSS testing. The New York Commission  
resolved all issues, except for several loop hot cut issues, while testing was being conducted. The  
Texas Commission resolved all issues and issued an order approving SBC on all Section 271 issues,

1 contingent on the successful completion of OSS testing. Those commissions have demonstrated that  
2 there is no reason to wait until the conclusion of OSS testing to consider all Section 271 issues.  
3 Each Checklist Item can be considered independent of OSS testing. Indeed, many of the other States  
4 in U S WEST's operating region are scheduling workshops on all fourteen Checklist Items before  
5 the completion of OSS Testing. Attached is the schedule recently adopted by the Colorado  
6 Commission.

7 In New York, the workshops were called technical conferences. The New York  
8 Commission held technical conferences on all Checklist Items during OSS testing. *See*, New York  
9 Public Service Commission, *Notice*, Case 97-C- 0271, April 4, 1999 (scheduling a technical  
10 conference on all Checklist Items, including the seven that involve OSS, while KPMG was finalizing  
11 its test plan).

12 The parties were first directed to consider the non-OSS issues of all Checklist Items.  
13 *See*; New York Public Service Commission, *Ruling Setting Agenda for Technical Conferences*, Case  
14 97-C- 0271, April 29, 1999 and *Ruling Further Detailing Agenda for Technical Conferences*, Case  
15 97-C- 0271, May 26, 1999 (“We will commence with Checklist Item (i) [interconnection, one of the  
16 7 Checklist Items with OSS implications], and parties will have the opportunity to present evidence  
17 on all non-OSS items.”); New York Public Service Commission, *Ruling Deciding Motions and*  
18 *Setting Schedule*, Case 97-C- 0271, June 22, 1999 (noting that the technical conference process had  
19 concluded non-OSS issues of Checklist Items (i), (ii), (v), (xi) and (xiv), all of which are among the  
20 seven Checklist Items impacted by OSS issues); New York Public Service Commission,  
21 *Letter/Ruling*, Case 97-C- 0271, July 16, 1999 (scheduling a further technical conference on, *inter*  
22 *alia*, Checklist Items (iv)(loops), (v)(switching) and (xi)(number portability)).

23 Even OSS issues of the checklist were resolved in the technical conference process  
24 before the conclusion of OSS testing. *See*, New York Public Service Commission, *Letter/Ruling*,  
25 Case 97-C- 0271, August 3, 1999. On August 3, 1999, the presiding administrative law judge issued  
26 a letter ruling indicating that the technical conference process had been concluded for all Checklist  
27 Items, other than Checklist Items (iv)(loops), (vii)(II)(directory listings), (viii)(white pages listings)  
28 and (xi)(number portability):

1 As a result, the technical conference process in this proceeding is now closed as to all of the  
2 checklist items contained in § 271(c)(2)(b) of the Telecommunications Act of 1996, with the  
3 exceptions noted above.

4 New York Public Service Commission, *Letter/Ruling*, Case 97-C- 0271, August 3, 1999.

5 Like New York, the Texas Commission held workshops on all Checklist Items before  
6 OSS testing was concluded:

7 Under the oversight of the Texas Commission, CLECs and SWBT participated in lengthy,  
8 often contentious meetings and technical workshops to resolve issues on virtually every  
9 aspect of Section 271 compliance.

10 Evaluation of the Public Utility Commission of Texas, *In the Matter of Application of SBC  
11 Communications, Inc., et al. for Provision of In-Region, interLATA Services in Texas*, FCC CC  
12 Docket No. 00-04, January 31, 2000, p. 2.

13 Like New York, the Texas Commission resolved all issues, including OSS issues, in  
14 the workshop process prior to the completion of OSS testing:

15 The 129 issues ranged from billing concerns and LIDB/directory listing database records to  
16 OSS change management and SWBT account manager relationship issues. Each of these  
17 issues was fully vetted, and where the parties were not in full agreement, the Texas  
18 Commissioners decided each individual issue in a series of open meetings in the Fall and  
19 Winter of 1998.

20 Evaluation of the Public Utility Commission of Texas, *In the Matter of Application of SBC  
21 Communications, Inc., et al. for Provision of In-Region, interLATA Services in Texas*, FCC CC  
22 Docket No. 00-04, January 31, 2000, p. 2. Following the conclusion of the workshops, but before  
23 the conclusion of OSS testing, the Texas Commission issued an order approving SBC on all Section  
24 271 issues, conditioned on the conclusion of OSS testing.

25 The New York and Texas Commissions instituted efficient processes, pursuant to which all  
26 issues were fully investigated before OSS testing was concluded. The result was that there was no  
27 unnecessary delay between the conclusion of OSS testing and the consideration of its results by the  
28 FCC. In both New York and Texas, the BOC was able to file with the FCC shortly after the  
conclusion of OSS testing. If the Arizona Commission waits until the OSS Test is concluded to  
conduct workshops on the remaining Section 271 issues, it is anticipated that at least six months will  
elapse before the test results will be presented to the FCC. Delaying workshops will run the risk that  
...

1 some parties will argue that the test results are out of date. More importantly, waiting to address the  
2 remaining OSS issues will deny Arizona consumers the benefits of a completely competitive market.

3 **D. Staff and U S WEST Request that the Process for the Remaining Issues be**  
4 **Patterned after the Process put in Place by the Hearing Division in its December**  
5 **8, 1999 Procedural Order.**

6 Staff and U S WEST recommend that the Commission adopt the same process for  
7 the remaining issues in this case as for the first seven Checklist Items. Under that process, the  
8 Commission Staff and DCI, the Commission's consultants, would facilitate the workshops. The  
9 parties would have the opportunity to file and present initial and responsive written and oral  
10 comments, document or exhibits at the workshops. All parties would have full opportunity to  
11 examine U S WEST regarding each checklist item. All comments, exhibits and presentations would  
12 be submitted under oath, and all workshops shall be transcribed.

13 Within 20 days after each Checklist Item is addressed, the Staff would file draft  
14 proposed findings of fact and conclusions of law for review by the parties. Parties would be allowed  
15 to file any proposed additional or revised findings of fact and conclusions of law within ten days  
16 after Staff files its draft. Within 10 days after the parties' deadline for the submission of comments  
17 on the draft Staff findings and conclusions, Staff would be required to file its recommended report.

18 For undisputed Checklist Items, Staff would submit its report to the Commission for  
19 consideration at an Open Meeting. Parties would have the opportunity to file exceptions to the report  
20 as with any other Open Meeting item.

21 For disputed Checklist Items, Staff would submit its report to the Hearing Division,  
22 with a procedural recommendation for resolving the dispute. The Hearing Division would submit  
23 a Proposed Order to the Commission and parties would once again be entitled to file exceptions to  
24 the proposed order.

25 **III. CONCLUSION**

26 Staff and U S WEST respectfully request that the Commission issue a procedural  
27 order instituting a series of workshops on all remaining Section 271 issues discussed above. The  
28 issues are particularly suited to a collaborative workshop process and will take considerable time to  
resolve. There is no reason to wait for the conclusion of the OSS Test to resolve them. The proposal

1 set forth above merely builds upon the collaborative process originally put in place by the Hearing  
2 Division. CLECs and U S WEST will benefit from a prompt resolution of these issues which should  
3 act to promote rigorous competition in all telecommunications markets in Arizona.

4 For all of the foregoing reasons, the Hearing Division should issue an order that  
5 immediately institutes a workshop process to consider all remaining issues in this case.

6 RESPECTFULLY SUBMITTED this 26th day of May, 2000.

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By:   
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**WORKSHOP SCHEDULE**

1. **NON-OSS-RELATED ITEMS (3, 7, 8, 9, 10, 12, 13):**

USWC affidavits/testimony:	Already filed
Comments:	8 May
Replies (permitted to all comments):	22 May
Workshop:	6-8 June
Follow-up workshop:	27 & 28 June
  
2. **COLLOCATION, INTERCONNECTION, RESALE:**

USWC supplemental affidavits/testimony:	20 June
Comments:	11 July
Replies (permitted to all comments):	25 July
Workshop:	1-3 August
Follow-up workshop:	scheduled as necessary
  
3. **xDSL, EMERGING SERVICES**

USWC supplemental affidavits/testimony:	8 August
Comments:	29 August
Replies (permitted to all comments):	12 September
Workshop:	19-21 September
Follow-up workshop:	scheduled as necessary
  
4. **UNE COMBINATIONS, TRANSPORT, SWITCHING and § 272**

USWC supplemental affidavits/testimony:	19 September
Comments:	10 October

Replies (permitted to all comments): 24 October  
Workshop: 31 October - 2 November  
Follow-up workshop: scheduled as necessary

5. LOOP ISSUES, LNP

USWC supplemental affidavits/testimony: 24 October  
Comments: 14 November  
Replies (permitted to all comments): 28 November  
Workshop: 5-7 December  
Follow-up workshop: scheduled as necessary