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BEFORE THE ARIZONA CORPORATION COMMISSION

1999 SEP -8 P 4:28 Arizona Corporation Commission

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Chairman

JIM IRVIN

Commissioner

WILLIAM A. MUNDELL

Commissioner

AZ CORP COMMISSION DOCUMENT CONTROL

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6 IN THE MATTER OF THE APPLICATION OF US) DOCKET NO. T-01051B-99-0105
 WEST COMMUNICATIONS, INC., A)
 7 COLORADO CORPORATION, FOR A HEARING) ARIZONA PAYPHONE
 TO DETERMINE THE EARNINGS OF THE) ASSOCIATION'S RESPONSE TO
 8 COMPANY, THE FAIR VALUE OF THE) US WEST'S OBJECTIONS TO
 COMPANY FOR RATEMAKING PURPOSES, TO) THIRD SET OF DATA REQUESTS
 9 FIX A JUST AND REASONABLE RATE OF)
 RETURN THEREON AND TO APPROVE RATE)
 10 SCHEDULES)

11 The Arizona Payphone Association (the "APA"), through undersigned counsel, hereby
12 responds to US West's objections to the APA's Third Set of Data Requests as follows:

13 1. The APA will accept data subsequent to and including January 1, 1993 in response
14 to Data Request Nos. 5, 6, and 7.

15 2. With respect to Data Request Nos. 10 and 11, US West is wrong. It is easier for US
16 West to obtain copies of the rating agencies reports than it is for the APA. The APA's request is
17 relevant, reasonable and US West should be required to respond to them.

18 In the event US West refuses to provide the rating agency reports requested, the APA will
19 promptly notify the Commission and seek an order compelling production of the reports.

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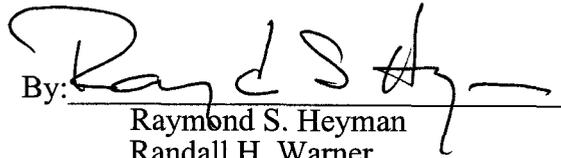
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RESPECTFULLY SUBMITTED this 8 day of September, 1999.

ROSHKA HEYMAN & DEWULF, PLC

By: 

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1 **Original of the foregoing filed**
2 **this 8th day of September, 1999, with:**

3 Docket Control
4 Arizona Corporation Commission
5 1200 W. Washington Street
6 Phoenix, Arizona 85007

7 **Copy of the foregoing mailed**
8 **this 8th day of September, 1999, to:**

9 Timothy Berg, Esq.
10 Fennemore Craig, P.C.
11 3003 N. Central Avenue, Suite 2600
12 Phoenix, Arizona 85012

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15 apa/pl/99-0105Response2Objections.doc

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