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March 5, 2002

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

Re: **IN THE MATTER OF THE INVESTIGATION OF THE COST OF
TELECOMMUNICATIONS ACCESS, DOCKET NO. T-00000D-00-0672**

Dear Sir or Madam:

Enclosed please find the original and ten copies of Sprint Communications Company L.P.'s Responses to the questions set forth in the Commission's December 3, 2001 Procedural Order in the above-captioned matter for filing with the Commission. Parties who wish to view the confidential portions of this filing may do so by signing a protective agreement, which will be provided upon request.

Do not hesitate to call me if you have any questions.

Sincerely,

Eric S. Heath

ESH/st

cc: Service List

Arizona Corporation Commission
DOCKETED

MAR 08 2002

DOCKETED BY	
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
CHAIRMAN
JIM IRVIN
COMMISSIONER
MARK SPITZER
COMMISSIONER

**IN THE MATTER OF THE
INVESTIGATION OF THE COST OF
TELECOMMUNICATIONS ACCESS**

) Docket No.: T-00000D-00-0672

)
) **SPRINT COMMUNICATIONS COMPANY**
) **L.P.'S RESPONSES TO QUESTIONNAIRE**

Sprint Communications Company L.P. hereby submits its responses to the Arizona Corporation Commission's ("Commission") questions contained in the December 3, 2001 Procedural Order in the above-captioned matter.

- 1) Do you believe that the Commission ought to restructure access charges? Please explain your response.

Yes. The intrastate access rates of the incumbent local exchange carriers ("ILECs") in Arizona continue to exceed the economic cost of access service and recover fixed costs on a traffic-sensitive basis. Sprint believes the rate level for access services should approximate the forward-looking economic cost of the service and that the structure of the access services should be governed by cost-causation. This means that all access charges should have an access cost associated with them and that the method of charging for access should reflect the manner in which these costs are incurred by the provider.

- 2) What recommendation to the Commission would you make regarding how intrastate access charges should be reformed?

Sprint recommends the following changes: Intrastate access charges should only consist of switching and transport services, which should reflect the economic cost of providing the service. The differences between the current switching and transport services rates and their economic costs are subsidies which should be eliminated. The other switched access elements carrier common line ("CCL") and residual interconnection charge ("RIC") are also subsidies. All of these subsidies are the costs of local exchange service that were "assigned" to switched access service in the past due to regulatory considerations dating back to the advent of access services. These costs should be recovered from the purchasers of local exchange service.

- 3) Would you recommend the Commission address both switched and special access in an access charge reform proceeding? If your response is yes, please explain.

Sprint recommends the Commission focus on the switched access services in this proceeding.

- 4) Parties who desire that switched access charges be reformed often state that switched access charges in general, and the CCL rate element in particular, contain implicit subsidies. Do you agree with this statement? Please provide an explanation of the rationale for your position, including any computations that you might have made.

Yes. Sprint believes the CCL rate element is an implicit subsidy. The CCL rate element recovers the cost of the local loop, which is a fixed cost. Loop cost does not change when a customer places a long distance call. Sprint believes costs should be borne by the service that creates the cost. In the case of the loop, the cost is incurred when the end user purchases local exchange service. Thus, the cost of the local loop should be included in the price of local service. As stated above other access rate elements also provide subsidy by being priced above their economic cost (in the case of switching and transport services) and by having no identifiable cost associated with the element in the case of the RIC.

- 5) Can implicit subsidies be quantified?

Yes. The subsidies are the differences between the revenue currently generated by the access charges and the revenue that would be generated if the access rates reflected the economic cost of providing those services. In the response to Question 7, Sprint provides an estimate of the current subsidies embedded in the ILEC intrastate access rates in Arizona.

- a) What is the appropriate cost standard to be used to determine whether access charges are free of implicit subsidies?

The appropriate cost standard is the forward-looking economic cost standard. This is the same standard that is used to establish the price for terminating local calls (reciprocal compensation) and unbundled network elements. The rate level for a particular access rate element should approximate the rate level of the corresponding reciprocal compensation charge or unbundled network element charge.

- b) What cost standard is used to set interstate access charges? Is this cost standard appropriate for intrastate rates?

Interstate access charges are regulated under price regulation. There is not a direct relationship between the prices charged and the cost of interstate access services. The FCC's CALLS order¹ did established target rate levels for traffic-sensitive rate elements (switching and transport). Sprint believes the FCC's targets on average approximate the economic cost of access service. To avoid LEC specific cost studies, the Commission could use the FCC's traffic-sensitive rates as an appropriate benchmark for the economic cost of intrastate access services.

¹ Sixth Report and Order, *In the Matter of Access Charge Reform*, CC Docket No. 96-262 (Rel. May 31, 2000).

- 6) Do you believe that interexchange carrier switched access charges ought to exist? Please provide your rationale for your position on this matter.

Sprint believes that all switched intercarrier compensation should eventually be eliminated. These costs should ultimately be recovered from the local exchange customers directly in a bill and keep mechanism. However, Sprint is concerned about the magnitude of the change on the average customer if the recovery of all switched access revenue was immediately shifted to the customer and therefore recommends a transitioned approach. Sprint believes the Commission should first reduce access service rates to their economic cost levels with increase to local exchange service rates and then shift the remaining switched access costs to the end users through the adoption of a bill and keep mechanism at a later date.

- 7) Please provide the following to assist in developing a rough estimate of the extent to which implicit subsidies exist in access charges assessed by Arizona local exchange companies.

- a) What is your estimate of the implicit subsidies that exist on a statewide basis?

Sprint estimates the subsidy at approximately \$55.7 million.

- b) Please explain how that estimate was developed.

Sprint calculated the approximate amount of implicit subsidy embedded in the Arizona intrastate access rates billed to Sprint based on Sprint's access minutes of use in the intrastate market. Because the interstate access charges of the two largest ILECs in Arizona, which combined approximate 93% of Sprint's access billing, were both impacted by the CALLS plan which brought access charges into rough compliance with the forward-looking economic cost of access service, Sprint used these interstate access rates as a proxy for economic cost of local switching and transport services in calculating the Arizona subsidy.

Using the approximate economic cost of traffic-sensitive rates, Sprint calculated the rate differential between current intrastate rates and the economic cost and multiplied this figure by Sprint's access minutes of use. Sprint then added this difference to the revenues generated from CCL and RIC. This amount is the total implicit subsidy in intrastate access services billed to Sprint from July 2000 to June 2001. Sprint then divided the Sprint-specific implicit subsidy amount by the Sprint market share to determine the statewide implicit subsidy.

$$\frac{((\text{Intrastate SW and TR Rates} - (\text{Interstate SW and TR}) * \text{Sprint MOU}) + \text{CCL \& TIC Rev})}{\text{Sprint Market Share \%}}$$

SW - Switching Rates

TR - Transport Rates

CCL - Carrier Common Line

TIC - Transitional Interconnection Charge

MOU - Minutes of Use

- c) What is your estimate of the existing implicit subsidies that exist by local exchange company?

***BEGIN SPRINT CONFIDENTIAL INFORMATION ***

Company	Estimate of Implicit Subsidies (Sprint specific)	Market Share	Industry Estimate of Implicit
ACSI			
BROOKS			
CENTURY			
CITIZENS			
COMPETITIVE LEC			
CONTEL/CA			
COX			
ELI			
GST			
LEC OTHER			
MCI METRO			
TCG			
TDS			
QWEST			
WINSTAR			
TOTAL			\$ 55,711,597

*** END SPRINT CONFIDENTIAL INFORMATION ***

- 8) Should access charges be set at the same rates as unbundled network elements for the same network elements and functionalities? Please explain your response.

The switched access rates for local switching, tandem switching and transport services should approximate the minute of use equivalent of the corresponding unbundled network elements and reciprocal compensation rates.

- 9) Your responses to the following questions will assist the Commission in determining how to proceed with this case from a procedural perspective.

- a) What procedure would you recommend be used to address switched access charge reform? For example would you recommend a generic proceeding to address the issues in general with the objective being the reform, restructure and resetting of switched access charges for every LEC in the State?

Sprint recommends a generic proceeding to address the reform of the intrastate switched access rates.

- b) What issues do you believe should be addressed in the proceeding to determine whether and to what extent intrastate access charges ought to be reformed?

The generic proceeding should quantify the implicit subsidies embedded in the intrastate access services. The Commission should authorize an alternative recovery of these revenues through flat rate charges to the purchasers of local exchange service. The Commission should consider the need for a Arizona Universal Service Fund to recover a portion of this implicit subsidy if the resulting flat rate charge is deemed not affordable to the average consumer in Arizona. Finally, the proceeding should address the reasonableness of the intrastate access rates charged by CLECs.

- c) Would you recommend that the Commission limit the initial switched access charge proceeding to the largest ILEC's in Arizona? If your response is yes, please identify those companies that you believe should be included in this proceeding.

No. Sprint believes the residual ratemaking principles that created subsidy-laden access rates was used to establish the access rates for all ILECs in the State. Therefore, it is appropriate that the proceeding address all ILECs in Arizona.

- d) Would you recommend that the Commission address access charge reform for large, intermediate and small local exchange companies (as defined in the Commission's Arizona Universal Service Fund rules) individually? Please explain.

No. Sprint believes access charges are considerably above cost for all ILECs. The reform principles should be applied to all ILECs in the state. Sprint recommends all ILECs be requested to participate in this proceeding.

- e) Would you recommend that the proceeding address switched access charges assessed by CLECs and/or other telecommunications companies?

Yes. Sprint is concerned with the intrastate access charges CLECs have been charging. The FCC addressed the reasonableness of interstate access rate levels in the 7th Report and Order in 96-262 released April 27, 2001. The Commission should address the reasonable rate level of intrastate access rates charged by CLECs in this proceeding.

- f) Given your vision of what the proceeding would address, how much time do you expect would be required to complete the proceeding?

Sprint believes it is reasonable to build a solid public record and reach the appropriate decision in time to implement the recommended changes by mid-summer, 2002. It is critical that Qwest have cost-based switched access rates prior to their entry into the interLATA toll market. (See answer to Question 19 for further detail).

- 10) For companies that provide access service, please provide the dollar amount of revenues from switched access charges that you received by rate element, by month, for the period July 1, 2000 through June 30, 2001.

Sprint is not an ILEC in Arizona.

- 11) For companies that purchase access service, please provide the dollar amount of payments for switched access charges that you made (by company, rate element, and month if possible) for the period July 1, 2000 to June 30, 2001.

This data is provided on Attachment A.

- 12) Do you believe that it would be possible to eliminate the potential that local exchange service providers can exert monopoly power in the access service market by assessing the switching, transport and CCL charges on the end users rather than on interexchange carriers? Could customers then shop for local exchange service customers for the least cost provider of access in addition to local service, etc?

The switched access service market has always been and will continue to be a monopoly with the power residing with the carrier that provides the customer local exchange service. The same carrier that provides a customer with local exchange service always provides exchange access service. However, by shifting the cost recovery of the use of the local network for long distance calls from the interexchange carrier to the end user, the customer will have full visibility to the cost of service. The end user will be able to make a more informed decision on the provider of their local service. Sprint supports a bill and keep mechanism for exchange access service, eventually. Sprint recommends a transitioned approach to this result.

- 13) Do you believe that there is a difference in the costs of providing interstate switched access service versus intrastate access service? In your response, please include a description of how costs are defined in your response and how those costs relate to costs allocated to the intrastate jurisdiction under the FCC's Separations rules.

The economic cost of network components to connect a toll carrier with a local exchange customer is the same no matter if the call is within the state or to a distant state. The same switching costs are incurred. The same transport elements are used to connect the calls. Sprint believes the appropriate basis for access service is the forward-looking economic cost of service. This cost may or may not have a relationship with allocated cost as directed by the FCC's Part 36 rules.

- 14) In the CALLS decision, the FCC implemented changes that would eliminate carrier common line charges and establish an interstate universal service support mechanism. Do you believe that the Commission ought to address the Arizona Universal Service Fund mechanism concurrent with the reform of intrastate access charges?

As a proponent of the CALLS proposal, Sprint agreed with the FCC's changes to recover the local loop cost allocated to the interstate jurisdiction through a flat rated charge to the cost causer, the purchaser of local exchange service. The FCC chose to recover these costs through increases to the subscriber line charge ("SLC"). The FCC further determined that the total allocated cost could result in a SLC that was not affordable to all end users. The FCC decided to recover the portion of the costs not recovered through the SLCs via a universal service fund. Sprint recommends this Commission undertake a similar process. Loop costs recovered in intrastate access should be recovered from the end user. If the

Commission deems the resulting increase not affordable to the average end user, an Arizona Universal Service fund may be needed. The need for a universal service fund should be part of this proceeding.

- 15) The FCC released its Access Charge Reform Order ("MAG Order") for rate of return companies on November 8, 2001. Please comment on the extent to which you believe the ACC should adopt any components of the MAG Order.

The FCC's MAG Order mirrors many of the key aspects of the CALLS Order for rate of return carriers. The MAG Order transitions the recovery of loop cost to flat rate recovery in the form of higher SLCs. The MAG Order implemented a universal service fund to support the loop costs not recovered for the SLCs. The residual interconnection charge is eliminated as a separate rate element. The MAG Order also reduces some of the traffic-sensitive rates by removing non-traffic-sensitive costs like the line cards. All of these changes are positive. Non-traffic-sensitive costs of local services are shifted from minute of use recovery from the interexchange carriers to flat rate recovery from the end user. The MAG Order however did not attempt to get the traffic-sensitive costs of switching and transport services near their economic costs. Because of this deficiency, Sprint does not believe the MAG Order completed the reform of the rate of return carrier's interstate access charges.

- 16) Should the Commission address CLEC access charges as part of this Docket?

Yes. As stated in our answer to Question 9e above, the Commission should address the reasonable rate level of intrastate access rates charged by CLECs in this proceeding.

- 17) Should additional considerations be taken into account when restructuring and/or setting access charges for small rural carriers? Please explain your response.

The same principles should be applied to all LECs. All access charges should have an access cost associated with them and that the method of charging for access should reflect the manner in which these costs are incurred by the provider. Sprint recognizes that costs vary by provider due to such issues as density of territory served. Any LEC should be given the opportunity to demonstrate their economic costs in setting their access service prices.

- 18) What is the effect of Qwest's Price Cap Plan on the issues raised in this proceeding as they pertain to Qwest? With regard to Qwest, switched access is a Basket 2 service and special access is a Basket 3 service. What impact does this have, if any, on restructuring access charges in this proceeding, as it would pertain to Qwest?

The Qwest Price Cap Plan and the reform of the intrastate access services as proposed by Sprint can co-exist. Sprint's plan will simply shift the recovery of the CCL and residual interconnection charge to services charged to the end user. Therefore, the reductions from Qwest's obligation to reduce revenue \$5 million per year should be realized by Qwest's end user through the services they purchase instead of by interexchange carrier via intrastate switched access rates.

- 19) With regard to Qwest, what impact would Qwest receiving 271 authority have on the issues raised in this proceeding? Please explain your response.

It is important that a RBOC entering the interLATA toll market charge their competitor prices for inputs that are equal to the cost the RBOC incurred in providing those services. For example, comparing the cost of originating an interstate toll call for Sprint to Qwest (presumably after 271 approval). Sprint would pay Qwest exchange access charges including CCL - \$0.0160, RIC - \$0.0025, Switching and Transport - \$ 0.0190 for a total of \$0.0375 per minute. The cost to the Qwest Corporation is the actual economic cost of providing exchange access service. As we have discussed above, CCL and RIC have no incremental cost when an intrastate interLATA call is placed. The current switching and transport charges are \$0.0135 higher than Qwest's economic cost. Thus, Qwest has a \$0.032 per minute cost advantage over Sprint on the originating side of the toll call. If the call also terminates in Qwest territory in another state, Qwest's cost advantage doubles. Thus it is important to reform the intrastate access rates of Qwest before it is granted 271 authority.

- 20) One of the stated objectives of the Qwest Price Cap Plan was to achieve parity between interstate and intrastate access charges. Is this something that should be looked at by the Commission in this proceeding?

Yes. Despite the good intentions of the Qwest Price Cap Plan, Qwest's intrastate rates are 9 times as high as their current interstate access rates. It will take 8 years of the Plan to achieve the interstate rate levels. However, the Commission can still reach it's objective of achieving parity. As stated in Sprint's response to Question 18, the Qwest Price Cap Plan and the reform of the intrastate access services as proposed by Sprint can co-exist. Sprint's plan will simply shift the recovery of the carrier CCL and residual interconnection charge to services charged to the end user. The reductions from Qwest's obligation to reduce revenue \$5 million per year should be realized by Qwest's end user through the services they purchase instead of by interexchange carrier via intrastate switched access rates. The result will rate parity for access services and annual reductions to the ratepayers of Arizona.

- 21) Are there other issues besides the rate restructuring and costing issues raised herein that should be addressed by the Commission in this Docket?

Sprint's plan outlines the most critical issues. Reforming switched access rates to cost-based levels is extremely important to facilitate a level playing field in the interLATA toll market.

- 22) Are there other State proceedings and/or decisions that you would recommend the Commission examine before it proceeds with this docket? Please attach any relevant State commission decisions to your comments.

The Commission is presented with a difficult task. Implicit subsidies that have been embedded in the intrastate access rate structure since the creation of access services should be eliminated. Other state commissions have reformed their access service rate levels and rate structures in accordance with principles similar to those expressed in the FCC's CALLS and MAG Order plans. The Ohio, Nebraska, Indiana, Kansas and Missouri State commissions, to name just a few, have all reformed access services recently by reducing access service rates and rebalancing those revenues to other services. This Commission should also address these implicit subsidies.

23) Please provide your recommendations for a procedural schedule for this case.

Sprint recommends an expeditious procedural schedule in order to reform intrastate access charges prior to any approval Qwest may receive to enter the interLATA long distance market in Arizona from this Commission. Accordingly, Sprint believes that the Commission Staff should use these questionnaire responses as a starting point for establishing the scope of this investigation, and that a final issues list could be established by mid-February, 2002. Allowing approximately six weeks for direct and rebuttal testimony, discovery could be completed by May 1, 2002, and a settlement conference scheduled by May 10, 2002 to resolve issues and determine the need for an evidentiary hearing. Even with hearings, the Parties could have briefs submitted to the Commission no later than July 1, 2002.

24) Please comment on the issues raised in Docket No. T-01051B-01-0391, In the Matter of Qwest Corporation's Tariff Filing to Introduce a New Rate Structure for an Access Service Used By Interexchange Carriers and their relationship to this Docket.

Sprint has one concern with the rate restructuring proposal Qwest has made in Docket No. T-01051B-01-0391. Qwest seeks to reduce CCL and local switching when creating the new rate elements. Sprint believes the costs of SS7 call setup are allocated to local switching within the separations process. Therefore, to properly match revenue and cost, the new rate elements should be created from the local switching rate element, only.

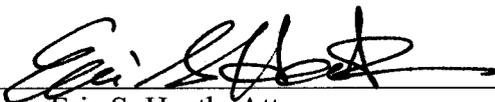
The FCC has deemed usage sensitive SS7 rate elements as a permissible rate structure, and this Commission should follow this same approach. Sprint points out that if the Commission requests an economic cost of local switching for Qwest in this proceeding and has approved Qwest's rate restructure, the cost study should not include costs for the separate SS7 rate elements.

25) Please comment on any other issues, you believe may be relevant to the Commission's examination of intrastate access charges.

Sprint has no additional issues at this time.

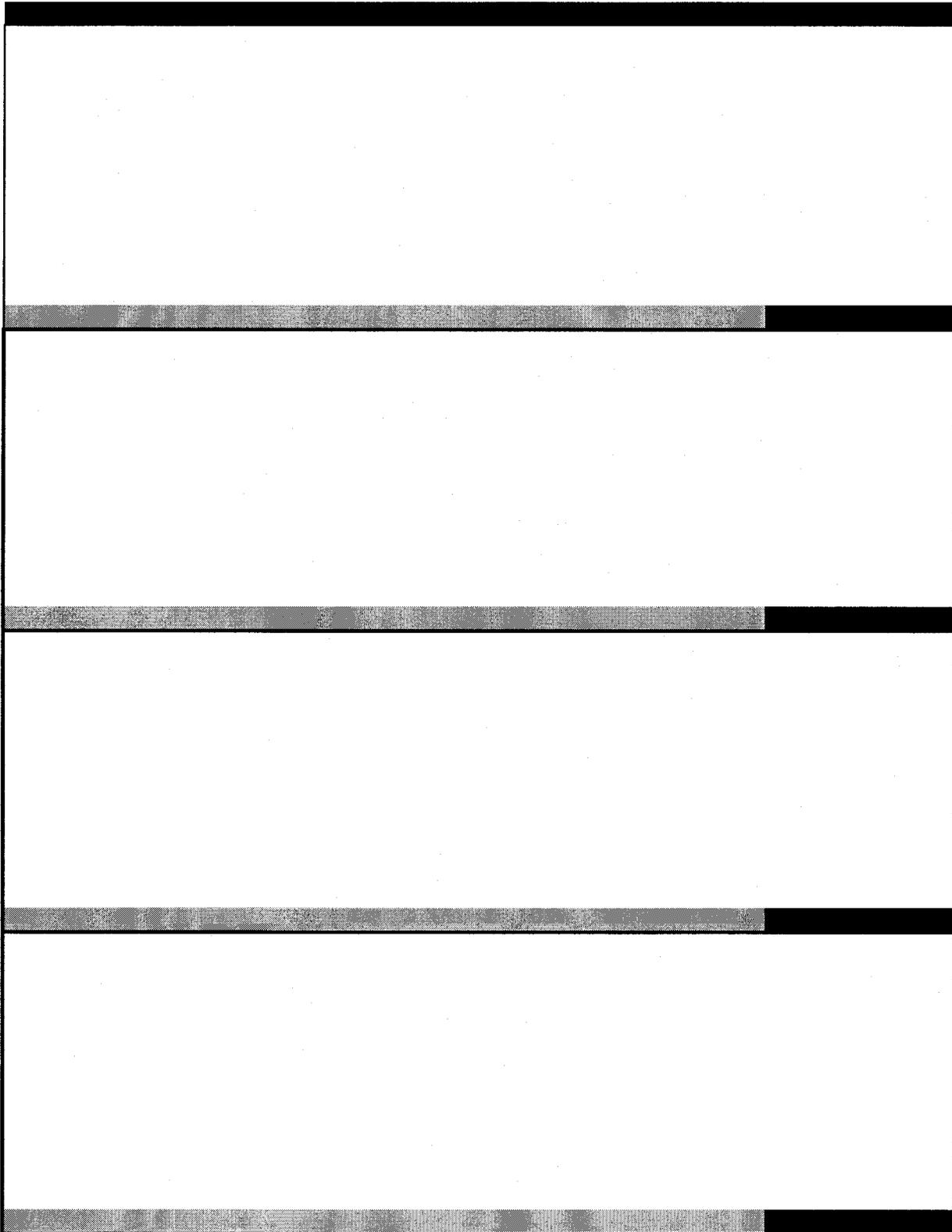
Dated this 7th day of March 2002.

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By: 
Eric S. Heath, Attorney

DOCKET No. T-00000D-00-0672
INVESTIGATION OF THE COST OF TELECOMMUNICATIONS ACCESS

CONFIDENTIAL ATTACHMENT A

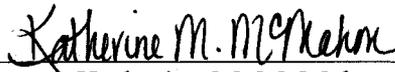


CONFIDENTIAL ATTACHMENT A

CERTIFICATE OF SERVICE

I, KATHERINE M. McMAHON, hereby certify that I have this day served a true and correct copy of "Sprint Communications Company L.P.'s Responses to Questionnaire" upon all parties of record in Docket No. T-00000D-00-0672 (see attached list) by placing a copy thereof into the U.S. Mail, postage prepaid.

Dated this 7th day of March 2002 at San Francisco, California.



Katherine M. McMahon
Legal Analyst II

Arizona

Date: 3/5/02

Docket No. T-00000D-00-0672

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CenturyTel of the Southwest, Inc.
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Citizens Utils. Rural Company, Inc.
Citizens Comm. Company of Arizona
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Salt Lake City, UT 84180

Copper Valley Telephone, Inc.
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Willcox, AZ 85644-0000

Midvale Telephone Exchange
P.O. Box 7
Midvale, ID 83645-0000

Navajo Comm. Company, Inc.
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Salt Lake City, UT 84180

Qwest Corporation
3033 N. 3rd Street, Room 1010
Phoenix, AZ 85012

Rio Virgin Telephone Company
Rio Virgin Telephone & Cablevision
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Estacada, OR 97023-0000

San Carlos Apache Telecom. Utility
P.O. Box 701
245 S. Hill
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South Central Utah Tel. Assn., Inc.
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Escalante, UT 84726-0000

Southwestern Telephone Co., Inc.
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Valley Telephone Cooperative, Inc.
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Citizens Telecom. Co. of the White
Mountains, Inc.
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Comm. South Companies, Inc.
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Covad Communications Company
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Santa Clara, CA 95054-0000

Cox Communications
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Phoenix, AZ 85027-0000

Digital Services Corporation
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Alexandria, VA 22314

E.Spire
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Annapolis Junction, MD 20701-0000

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Salt Lake City, UT 84180

Eschelon Telecom. of Arizona, Inc.
730 Second Ave., South, Suite 1200
Minneapolis, MN 55402-0000

Global Crossing Telemangement, Inc.
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Rochester, NY 14646-0000

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Jato Operating Corporation
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Englewood, CO 80111

Level 3 Communications, LLC
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Broomfield, CO 80021

Max-Tel Communications, Inc.
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Metropolitan Fiber Systems of AZ, Inc.
201 Spear Street, 9th Floor
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Tucson, AZ 85716-0000

North County Comm. Corporation
3802 Rosecrans, Suite 485
San Diego, CA 92110-000

OnePoint Communications
2 Conway Park
150 Field Drive, Suite 300
Lake Forest, IL 60045-0000

RCN Telecom Services, Inc.
105 Carnegie Center
Princeton, NJ 08540-0000

Reflex Communications, Inc.
83 S. King Street, Suite 106
Seattle, WA 98104

Rhythm Links, Inc.
9100 E. Mineral Circle
Englewood, CO 80112-0000

TCG Phoenix
111 W. Monroe Street, Suite 1201
Phoenix, AZ 85004

The Phone Company/Network Svcs.
Of New Hope
6805 Route 202
New Hope, PA 18938-0000

Verizon Select Services, Inc.
6665 N. MacArthur Blvd., HQK02D84
Irving, TX 75039-0000

Winstar Wireless of Arizona, Inc.
1577 Spring Hill Road, 2nd Floor
Vienna, VA 22182

XO Arizona, Inc.
3930 E. Watkins, Suite 200
Phoenix, AZ 85034

360Networks (USA) Inc.
12101 Airport Way
Broomfield, CO 80021

Allcom USA
2151 E. Convention Center Way,
Suite 207-A
Ontario, CA 91764-4483

Alliance Group Services, Inc.
1221 Post Road, East
Westport, CT 06880-0000

American Telephone Network, Inc..
2313 6th Avenue, South
Birmingham, AL 35233-0000

Archtel, Inc.
1800 W. Park Drive, Suite 250
Westborough, MA 01581-0000

Caprock Telecommunications Corp.
15601 N. Dallas Parkway
Dallas, TX 75248

Communique Telecommunications,
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4015 Guasti Road
Ontario, CA 91761-0000

Enhanced Communications Network,
Inc.
37 Winthrop Place
Hazlet, NJ 07730-0000

Ernest Communications, Inc.
6475 Jimmy Carter Blvd., Suite 300
Norcross, GA 30071-0000

GST Net, Inc.
4001 Main Street
Vancouver, WA 98663

IG2, Inc.
80-02 Kew Garden Road, Suite 5000
Kew Gardens, NY 11415-0000

Independent Network Services Corp.
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Phoenix, AZ 85004-0000

Main Street Telephone Company
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Net-Tel Corporation
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One Point Communications
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Opex Communications, Inc.
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Pac-West Telecomm. Inc.
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Qwest Communications Corporation
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Denver, CO 80202-0000

Single Billing Services, Inc.
9550 Flair Drive, Suite 409
El Monte, CA 91731-0000

Special Accounts Billing Group, Inc.
1523 Withorn Lane
Inverness, IL 60067-0000

Teligent Services, Inc.
8065 Leesburg Pke, Suite 400
Vienna, VA 22182-0000

Tess Communications, Inc.
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Westminster, CO 80234

Touch America
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Butte, MT 59701

VYVX, LLC
1 Williams Center, MD29-1
Tulsa, OK 74172

Western CLEC Corporation
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Bellevue, WA 98006-0000

Williams Local Network, Inc.
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Tulsa, OK 74172

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Date: 3/5/02

Docket No. T-00000D-00-0672

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Copper Valley Telephone, Inc.
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San Carlos Apache Telecom. Utility
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Mountain Telecommunications, Inc.
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RCN Telecom Services, Inc.
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