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Arizona Corporation Commission

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APR 08 2002

April 5, 2002

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



**Re: In the Matter of the Investigation of the Cost of Telecommunications
Access, Docket No. T-00000D-00-0672**

Dear Corporation Commissioners and Staff:

On March 28, 2002, Staff submitted its recommendation and proposed procedural schedule in the Access Cost Investigation, Docket No. T-00000D-00-0672. In accordance with the January 16, 2002, Procedural Order in that docket, this letter responds to the Staff's recommendation and proposed procedural schedule. Citizens submits its response on behalf of its three incumbent local exchange carrier ("ILEC") affiliates operating in Arizona: (1) Frontier Citizens Utilities Rural (f/k/a Citizens Utilities Rural Company), T-01954B, (2) Frontier Communications of the White Mountains (f/k/a Citizens Telecommunications Company of the White Mountains), T-03214A and (3) Navajo Communications Company, T-02115A.

Citizens agrees with Staff that the Access Cost Investigation should be a generic proceeding and welcomes the opportunity to file written testimony as recommended by Staff. While ambitious in light of the complex issues raised, Staff's proposed procedural schedule seems workable at this time. Citizens' only apprehension is its limited resources, which could be heavily taxed should it become necessary to address equally significant issues arising in other dockets over the course of this Spring and Summer.

As in its initial comments, Citizens again requests that the Commission consolidate this docket with its pending AUSF Rule Revision, Docket No. RT-00000H-97-0137. The issues raised in both dockets are inseparably linked. Access charge revenues have long constituted an important form of implicit support for basic local exchange service provided by Arizona's rural ILECs. For the reasons given in its comments in both proceedings, Citizens believes that it is in the public interest to replace the existing implicit support from exchange access with explicit support from the AUSF. The Staff's March 28, 2002, recommendation seems to recognize this linkage when it asks those proposing elimination of CCL charges to estimate the amount of AUSF support that might be needed to offset the resulting loss of revenue.

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Finally, Citizens would like to take this opportunity to clarify its initial comments in this docket in one respect. Citizens also agrees with the Staff that the principal focus of the Access Cost Investigation should be on switched access, not special access. Citizens did not intend to suggest by its comments on Issue/Question No. 3 that special access rates are in need of reform, only that switched and special access services are to a certain extent substitutes for one another.

An additional copy of this letter is enclosed. Please stamp this copy received and return it in the enclosed stamped, self-addressed envelope.

Sincerely,

A handwritten signature in cursive script that reads "Curt Huttsell".

Curt Huttsell, Ph.D
State Government Affairs