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BEFORE THE ARIZONA CORPORATION COMMISSION
Arizona Corporation Commission

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2 WILLIAM A. MUNDELL
Chairman
3 JIM IRVIN
Commissioner
4 MARC SPITZER
Commissioner

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AZ CORP COMMISSION
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6 IN THE MATTER OF THE
7 INVESTIGATION INTO THE COST OF
8 TELECOMMUNICATIONS ACCESS

Docket No. T-00000D-00-0672

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10 **MOTION BY COMMISSION STAFF TO
SUSPEND THE PROCEDURAL SCHEDULE**

11 The Commission Staff initially requested that this Docket be opened to determine if current
12 statewide access charges reflect their costs. In November, 2001, the Commission Staff filed a
13 Request for a Procedural Order and included therein a list of questions on which Staff sought
14 comment by interested parties. By Procedural Order dated December 3, 2001, interested parties were
15 directed to provide written comment on the issues and questions presented no later than January 4,
16 2002. Based upon the comment received, Staff filed its list of procedural recommendations for this
17 proceeding, including a proposed procedural schedule. By Procedural Order dated May 21, 2002,
18 the Hearing Division established a procedural schedule which requires Staff to file testimony in
19 approximately one month. Because of subsequent issues which have arisen in other dockets and the
20 need to devote significant Staff resources to resolving those issues, Staff requests that the procedural
21 schedule in this Docket be suspended indefinitely until Staff has sufficient resources available to
22 adequately address the very complex and difficult issues raised herein.

23 At the time Staff requested a procedural schedule in this Docket, Staff was unaware that
24 developments in other cases would require the diversion and commitment of significant Staff
25 resources to resolve. Specifically, Staff anticipates having to dedicate significant resources to any
26 hearing which may be held in the Docket examining Qwest's compliance with Section 252(e) of the
27 Federal Act. Additionally, several parties have requested that the record in the Section 271
28 proceeding be reopened to address issues which they claim have not been resolved as a result of

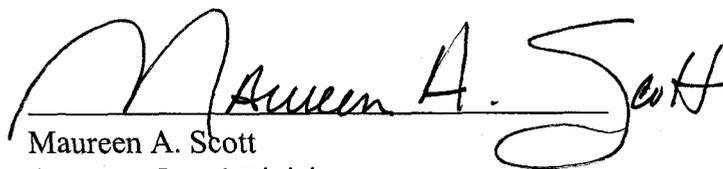
1 agreements between Qwest and Eschelon. Staff's review of these requests will take considerable
2 time. In addition, significant Staff resources will be needed to address ongoing proceedings
3 involving Customer Proprietary Network Information (CPNI) and the plans submitted by Arizona
4 ETCs for study area disaggregation to determine Federal universal service funds in the future. All
5 of these dockets raise very complex and difficult issues all of which will require significant Staff
6 attention in the next few months.

7 While Staff believes that this Docket is also important, and should be resolved as soon as
8 possible, Staff has already devoted significant resources to many of the Dockets listed above and
9 believes they should be completed before the records become stale and much of the work must be
10 repeated. Still another docket referenced may impact the amount of Federal universal service funds
11 available to some Arizona carriers, and as such its timely completion is important.

12 Finally, the issues raised in this Docket are very complex and will require significant Staff
13 time. The issues do not only involve costing issues, but universal service issues as well. Some of
14 the more important issues are set forth in the Hearing Division's most recent procedural order in this
15 Docket dated May 21, 2002.

16 WHEREFORE, the Arizona Commission Staff respectfully requests that due to the
17 magnitude of other proceedings now pending requiring significant Staff resources, that the
18 procedural schedule in this case be suspended indefinitely until such time as Staff is able to
19 commit the level of resources that are necessary given the importance of the issues raised in this
20 Docket.

21 RESPECTFULLY submitted this 28th day of June, 2002.

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1 The Original and ten copies of the
2 foregoing were filed this 28th
3 day of June, 2002 with:

3 Docket Control
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6 Copies of the foregoing were mailed
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10		RCN Telecom Services, Inc. 105 Carnegie Center Princeton, NJ 08540-0000
11	Digital Services Corporation 211 N. Union St, Ste. 300 Alexandria, VA 22314	Reflex Communications, Inc. 1601 Fifth Avenue, Suite 710 Seattle, WA 98101-1625
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13	Eschelon Telecom of Arizona, Inc. 730 Second Ave. South, Suite 1200 Minneapolis, MN 55402-0000	Eric S. Heath Sprint Communications Company L. P. 100 Spear Street, Suite 930 San Francisco, CA 94105
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17	Jato Operating Corp. 1099 Eighteenth St., Suite 700 Denver, CO 80202	The Phone Company/Network Services of New Hope 6805 Route 202 New Hope, PA 18938-0000
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19	Level 3 Communications, LLC 1025 Eldorado Blvd. Broomfield, CO 80021	Verizon Select Services, Inc. HOK02D84 6665 N MacArthur Blvd, Irving, TX 75039-0000
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4 Westborough, MA 01581-0000
5 Enhanced Communications Network, Inc.
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6 Hazlet, NJ 07730-0000
7 Ernest Communications, Inc.
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10 GST Net, Inc.
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12 IG2, INC.
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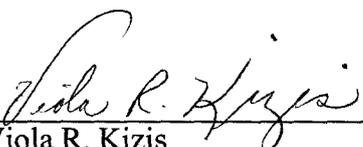
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