



0000020548

ORIGINAL

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

Arizona Corporation Commission

DOCKETED

2002 JUL -1 P 3:52

WILLIAM A. MUNDELL

Chairman

JIM IRVIN

Commissioner

MARC SPITZER

Commissioner

JUL - 1 2002

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY	<i>AR</i>
-------------	-----------

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

Docket No. T-00000D-00-0672

**AT&T AND TCG'S RESPONSE TO
MOTION TO SUSPEND
PROCEDURAL SCHEDULE**

AT&T Communications of the Mountain States, Inc., and TCG Phoenix
(collectively, "AT&T") hereby respond to the Motion to Suspend Procedural Schedule
filed by Staff on June 28, 2002. In that Motion, Staff requested that the procedural
schedule be suspended indefinitely until Staff found resources sufficient to adequately
address the complex and difficult issues surrounding access cost reductions.

AT&T recognizes that Staff is unusually burdened by various telecommunications
dockets at present and, although disappointed the docket may be suspended, does not
oppose Staff's Motion. AT&T would, however, like to file testimony that is current, up-
to-date and accurate throughout the proceeding. For this reason, AT&T respectfully
requests permission to file its direct testimony after a new procedural order is issued
reestablishing a schedule for this docket. AT&T asks that all intervenors be given the
opportunity to file direct testimony, or update testimony already on file once the
suspension is lifted. In this way, Staff can respond to current testimony and accurate

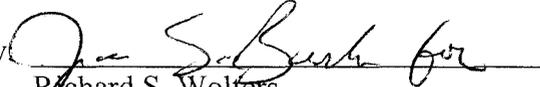
figures, and the delay necessitated by the suspension will not adversely affect the Commission's ultimate decision in this docket.

The Commission has recently, and appropriately, focused on obtaining current data and current numbers to support important telecommunications decisions in Arizona. This docket would similarly benefit from a record that contains the most current information the parties can offer.

AT&T respectfully requests that any order granting the Staff's motion to suspend this docket, also grant all intervenors the opportunity to file direct testimony, or update testimony on file, once the schedule for the docket is re-established. Alternatively, AT&T requests until July 19th to file its direct testimony. AT&T is an active participant in the Arizona telecommunications dockets that are taxing the resources of the ACC Staff. AT&T witness are similarly burdened and need additional time to complete testimony. This request will not compromise or prejudice any other party as it appears this docket is on the verge of being suspended and all parties will have an opportunity to supplement direct testimony when a procedural schedule for the docket is re-established.

Dated this 4 day of July, 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.,
AND TCG PHOENIX**

By 
Richard S. Wolters
1875 Lawrence Street, Suite 1503
Denver, Colorado 80202
Telephone: (303) 298-6741

Joan S. Burke
Osborn Maledon, P.A.
2929 N. Central Ave., Suite 2100
Phoenix, AZ 85012

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T and TCG's Response to Motion to Suspend Procedural Schedule, regarding Docket No. T-00000D-00-0672, were hand delivered this 1st day of July, 2002, to:

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

and that a copy of the foregoing was hand-delivered this 1st day of July, 2002 to the following:

Ernest Johnson
Director - Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Dwight Nodes
Hearing Officer
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was sent via United States Mail, postage prepaid, on the 1st day of July, 2002 to the following:

SCOTT WAKEFIELD, CHIEF
COUNSEL
RUCO
2828 NORTH CENTRAL AVENUE, STE.
1200
PHOENIX, AZ 85004-1022

TIMOTHY BERG
THERESA DWYER
FENNEMORE CRAIG
3003 NORTH CENTRAL AVENUE, STE.
2600
PHOENIX, AZ 85012

ACCIPITER COMMUNICATIONS
INCORPORATED
2238 WEST LONE CACTUS DR., SUITE
100
PHOENIX, AZ 85027

ARIZONA TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

CERTIFICATE OF SERVICE

I hereby certify that the original and 10 copies of AT&T and TCG's Response to Motion to Suspend Procedural Schedule, regarding Docket No. T-00000D-00-0672, were hand delivered this 1st day of July, 2002, to:

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

and that a copy of the foregoing was hand-delivered this 1st day of July, 2002 to the following:

Ernest Johnson
Director - Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Christopher Kempley
Chief Counsel - Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Lyn Farmer
Chief Hearing Officer
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Maureen Scott
Legal Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

and that a copy of the foregoing was sent via United States Mail, postage prepaid, on the 1st day of July, 2002 to the following:

SCOTT WAKEFIELD, CHIEF
COUNSEL
RUCO
2828 NORTH CENTRAL AVENUE, STE.
1200
PHOENIX, AZ 85004-1022

TIMOTHY BERG
THERESA DWYER
FENNEMORE CRAIG
3003 NORTH CENTRAL AVENUE, STE.
2600
PHOENIX, AZ 85012

ACCIPITER COMMUNICATIONS
INCORPORATED
2238 WEST LONE CACTUS DR., SUITE
100
PHOENIX, AZ 85027

ARIZONA TELEPHONE COMPANY
PO BOX 5158
MADISON, WI 53705-0158

CENTURYTEL OF THE OUTHWEST,
INC.
CENTURYTEL
P O BOX 4065
MONROE, LA 71211-4065

CITIZENS UTILITIES RURAL
COMPANY, INC.
CITIZENS COMMUNICATIONS
COMPANY OF ARIZONA
4 TRIAD CENTER, SUITE 200
SALT LAKE CITY, UT 84180

COPPER VALLEY TELEPHONE, INC.
PO BOX 970
WILLCOX, AZ 85644-0000

MIDVALE TELEPHONE EXCHANGE
PO BOX 7
MIDVALE, ID 83645-0000

NAVAJO COMMUNICATIONS
COMPANY, INC.
4 TRIAD CENTER, SUITE 200
SALT LAKE CITY, UT 84180

QWEST CORPORATION
3033 N 3RD STREET ROOM 1010
PHOENIX, AZ 85012
MANAGEMENT CONTACT:

RIO VIRGIN TELEPHONE COMPANY
RIO VIRGIN TELEPHONE &
CABLEVISION
PO BOX 189
ESTACADA, OR 97023-0000

SOUTH CENTRAL UTAH TELEPHONE
ASSOCIATION, INC.
PO BOX 226
ESCALANTE, UT 84726-0000

SOUTHWESTERN TELEPHONE CO,
INC.
PO BOX 5158
MADISON, WI 53705-0158

TABLE TOP TELEPHONE COMPANY,
INC.
600 N SECOND AVENUE
AJO, AZ 85321-0000

VALLEY TELEPHONE COOPERATIVE
INC.
752 E MALLEY STREET P O BOX 970
WILLCOX, AZ 85644

VERIZON CALIFORNIA INC.
ONE VERIZON WAY - CA500GCF
THOUSAND OAKS, CA 91362-3811

GREGORY HOFFMAN
AT&T COMMUNICATIONS OF THE
MOUNTAIN STATES, INC.
795 FOLSOM STREET, ROOM 2159
SAN FRANCISCO, CA 94107-1243

BROOKS FIBER COMMUNICATIONS
OF TUCSON, INC.
201 SPEAR STREET 9TH FLOOR
SAN FRANCISCO, CA 94105

CITIZENS LONG DISTANCE
COMPANY
5600 HEADQUARTERS DRIVE
PLANO, TX 75024

CITIZENS TELECOMMUNICATIONS
COMPANY OF ARIZONA L.L.C.
4 TRIAD CENTER, STE. 200
SALT LAKE CITY, UT 84180

CITIZENS TELECOMMUNICATIONS
COMPANY OF THE WHITE
MOUNTAINS INC
4 TRIAD CENTER, STE. 200
SALT LAKE CITY, UT 84180

COMM SOUTH COMPANIES INC.
2909 N. BUCKNER BLVD., STE. 800
DALLAS, TX 75228-0000

COVAD COMMUNICATIONS
COMPANY
4250 BURTON DRIVE
SANTA CLARA, CA 95054-0000

COX COMMUNICATIONS
20401 NORTH 29TH AVENUE
PHOENIX, AZ 85027-0000

DIGITAL SERVICES CORPORATION
211 N. UNION ST, STE. 300
ALEXANDRIA, VA 22314

E.SPIRE
131 NATIONAL BUSINESS PARKWAY,
STE. 100
ANNAPOLIS JUNCTION, MD 20701-
0000

ELECTRIC LIGHTWAVE, INC.
4 TRIAD CENTER, STE. 200
SALT LAKE CITY, UT 84180

ESCHELON TELECOM OF ARIZONA,
INC.
730 SECOND AVENUE SOUTH SUITE
1200
MINNEAPOLIS, MN 55402-0000

GLOBAL CROSSING
TELEMANAGEMENT, INC.
180 SOUTH CLINTON
ROCHESTER, NY 14646-0000

INTERMEDIA COMMUNICATIONS
INC
ONE INTERMEDIA WAY
TAMPA, FL 33647-1752

LEVEL 3 COMMUNICATIONS, LLC
1025 ELDORADO BLVD.
BROOMFIELD, CO 80021-8869

MAX-TEL COMMUNICATIONS, INC.
105 N. WICKHAM, P. O. BOX 280
ALVORD, TX 76225-0000

MCIMETRO
201 SPEAR STREET 9TH FLOOR
SAN FRANCISCO, CA 94105

METROPOLITAN FIBER SYSTEMS OF
ARIZONA, INC.
201 SPEAR STREET 9TH FLOOR
SAN FRANCISCO, CA 94105

MOUNTAIN
TELECOMMUNICATIONS, INC.
2540 E. 6TH STREET
TUCSON, AZ 85716-0000

NORTH COUNTY COMMUNICATIONS
CORPORATION
3802 ROSENCRANS, SUITE 485
SAN DIEGO, CA 92110-0000

ONEPOINT COMMUNICATIONS
TWO CONWAY PARK, 150 FIELD DR.,
STE. 300
LAKE FOREST, IL 60045-0000

REFLEX COMMUNICATIONS, INC.
83 SOUTH KING STREET, STE. 106
SEATTLE, WA 98104

SPRINT COMMUNICATIONS
COMPANY L. P.
6860 W. 115TH, MS:KSOPKD0105
OVERLAND PARK, KS 66211

THE PHONE COMPANY/NETWORK
SERVICES OF NEW HOPE
6805 ROUTE 202
NEW HOPE, PA 18938-0000

WINSTAR WIRELESS OF ARIZONA,
INC.
1577 SPRING HILL RD. 2ND FLOOR
VIENNA, VA 22182

360NETWORKS (USA) INC.
12101 AIRPORT WAY
BROOMFIELD, CO 80021

ALLIANCE GROUP SERVICES, INC.
1221 POST ROAD EAST
WESTPORT, CT 06880-0000

ARCHTEL, INC.
1800 WEST PARK DRIVE SUITE 250
WESTBOROUGH, MA 01581-0000

RCN TELECOM SERVICES, INC.
105 CARNEGIE CENTER
PRINCETON, NJ 08540-0000

RHYTHM LINKS, INC.
9100 E. MINERAL CIRCLE
ENGLEWOOD, CO 80112-0000

TCG PHOENIX
111 WEST MONROE STREET STE.
1201
PHOENIX, AZ 85004

VERIZON SELECT SERVICES, INC.
6665 N MACARTHUR BLVD,
HQB02D84
IRVING, TX 75039-0000

XO ARIZONA, INC.
3930 E. WATKINS STE 200
PHOENIX, AZ 85034

ALLCOM USA
2151 E. CONVENTION CNTR WAY,
STE 207-A
ONTARIO, CA 91764-4483

AMERICAN TELEPHONE NETWORK,
INC.
2313 6TH AVE SOUTH
BIRMINGHAM, AL 35233-0000

MCLEODUSA COMMUNICATIONS
400 S HIGHWAY 169, SUITE 750
MINNEAPOLIS, MN 55426

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

MCI WORLDCOM NETWORK
SERVICES, INC.
201 SPEAR STREET, 9TH FLOOR
SAN FRANCISCO, CA 94105

NEXTLINK LONG DISTANCE
SERVICES, INC.
3930 E. WATKINS SUITE 200
PHOENIX, AZ 85034

ONE POINT COMMUNICATIONS
TWO CONWAY PARK SUITE 300
LAKE FOREST, IL 60045

PAC-WEST TELECOMM, INC.
1776 W. MARCH LANE #250
STOCKTON, CA 95207

SINGLE BILLING SERVICES, INC.
9550 FLAIR DRIVE STE 409
EL MONTE, CA 91731-0000

TELIGENT SERVICES, INC.
8065 LEESBURG PIKE SUITE 400
VIENNA, VA 22182-0000

GLOBAL CROSSING
TELECOMMUNICATIONS, INC.
180 SOUTH CLINTON AVENUE
ROCHESTER, NY 14646-0000

IG2, INC.
80-02 KEW GARDEN ROAD SUITE
5000
KEW GARDENS, NY 11415-0000

MAIN STREET TELEPHONE
COMPANY
200 ITHAN CREEK AVENUE
VILLANOVA, PA 19085

NET-TEL CORPORATION
11921 FREEDOM DRIVE
RESTON, VA 20190

NORTH COUNTY COMMUNICATIONS
CORPORATION
3802 ROSENCRANS SUITE 485
SAN DIEGO, CA 92110-0000

OPEX COMMUNICATIONS, INC.
500 EAST HIGGINS ROAD STE 200
ELK GROVE VILLAGE, IL 60007-0000

QWEST COMMUNICATIONS
CORPORATION
555 17TH STREET
DENVER, CO 80202-0000

SPECIAL ACCOUNTS BILLING
GROUP, INC.
1523 WITHORN LANE
INVERNESS, IL 60067-0000

TESS COMMUNICATIONS, INC.
12050 PECOS STREET, STE. 300
WESTMINSTER, CO 80234

TOUCH AMERICA
130 N. MAIN STREET
BUTTE, MT 59701

WESTERN CLEC CORPORATION
3650 131ST AVE SE SUITE 400
BELLEVUE, WA 98006-0000

MICHAEL PATTEN
ROSHKA HEYMAN & DEWULF
400 E VAN BUREN SUITE 800
PHOENIX, AZ 85004

BRADLEY CARROLL
COX ARIZONA TELECOM LLC
20401 N 27TH AVENUE
PHOENIX, AZ 85027

VYVX, LLC
ONE WILLIAMS CENTER, MD 29-1
TULSA, OK 74172

WILLIAMS LOCAL NETWORK, INC.
ONE WILLIAMS CENTER, MD 29-1
TULSA, OK 74172

ERIC HEATH
SPRINT COMMUNICATIONS CO LP
100 SPEAR STREET, SUITE 930
SAN FRANCISCO, CA 94105

ARIZONA REPORTING SERVICE, INC
2627 N. THIRD STREET, SUITE THREE
PHOENIX, ARIZONA 85004-1103