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BEFORE THE ARIZONA CORPORATION COMMISSION

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1  
2 WILLIAM A. MUNDELL  
CHAIRMAN  
3 JIM IRVIN  
COMMISSIONER  
4 MARC SPITZER  
COMMISSIONER

Arizona Corporation Commission

DOCKETED

AUG 01 2002

AZ CORP COMMISSION  
DOCUMENT CONTROL

DOCKETED BY *CM*

6 IN THE MATTER OF THE  
7 INVESTIGATION OF THE COST OF  
TELECOMMUNICATIONS ACCESS

DOCKET NO. T-00000D-00-0672

MOTION TO CONSOLIDATE/  
MOTION TO RECONSIDER  
INDEFINITE EXTENSION

9  
10 Citizens Communications Company, Navajo Communications Company, Inc., Citizens  
11 Telecommunications Company of White Mountains, Inc., dba Frontier Communications of  
12 White Mountains and Citizens Utilities Rural Company, Inc., dba Frontier Citizens Utilities  
13 Rural (collectively, "Citizens"), hereby moves the Arizona Corporation Commission  
14 ("Commission") pursuant to A.A.C. R14-109(H) to consolidate the above-captioned docket,  
15 Docket No. T-00000D-00-0672 with Docket No. RT-00000H-97-0137, In the Matter of  
16 Review and Possible Revision of Arizona Universal Service Fund Rules. The issues in each  
17 docket are substantially related and that the rights of all parties of record will not be  
18 prejudiced by such consolidation.

19 Further, on or about June 28, 2002, Staff filed a Motion to Suspend Procedural  
20 Schedule for an indefinite period of time. The Commission granted Staff's Motion. Citizens  
21 hereby requests that the Commission reconsider the decision to suspend the procedural  
22 schedule for an indefinite period of time and limit such suspension to a period of 30 to 45  
23 days.

24 Further, Citizens respectfully requests the Commission allow Citizens the opportunity  
25 to update its testimony in this docket once the suspension is lifted.  
26

1 Finally, Citizens Communications requests that the Commission require all parties of  
2 record to provide copies of all filings to all parties on the service list.

3 WHEREFORE, for all the foregoing reasons:

4 Citizens respectfully requests that the Commission issue an order granting this Motion  
5 to Consolidate.

6 Further, Citizens respectfully requests that the Commission reconsider suspending the  
7 procedural schedule for an indefinite period and limit such suspension to 30 to 45 days.

8 Further, Citizens respectfully requests the Commission allow Citizens the opportunity  
9 to update its testimony in this docket.

10 Finally, Citizens respectfully requests that the Commission issue an order requiring  
11 all parties of record to provide copies of all filings to all parties on the service list.

12 RESPECTFULLY SUBMITTED this 1<sup>st</sup> day of August, 2002.

13 CHEIFETZ & IANNITELLI, P.C.

14  
15 By 

16 Steven W. Cheifetz  
17 John C. Marcolini  
18 Robert J. Metli  
19 3238 North 16<sup>th</sup> Street  
20 Phoenix, Arizona 85016  
21 Attorneys for Citizens  
22 Communications Company

23 Original and eighteen (18) copies of the foregoing  
24 filed this 1<sup>st</sup> day of August, 2002, with:

25 Docket Control  
26 ARIZONA CORPORATION COMMISSION  
1200 West Washington Street  
Phoenix, Arizona 85007

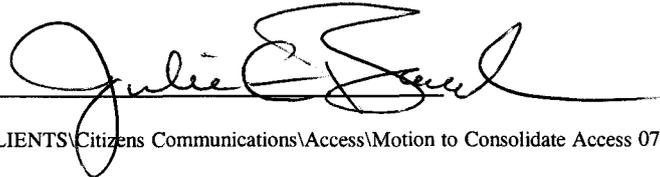
1 Copies of the foregoing hand-delivered  
this 15<sup>th</sup> day of August, 2002, to:

2 Lyn Farmer, Chief Hearing Officer  
ARIZONA CORPORATION COMMISSION  
3 1200 West Washington Street  
Phoenix, Arizona 85007

4 Chris Kempley, Chief Counsel  
5 Legal Division  
ARIZONA CORPORATION COMMISSION  
6 1200 West Washington Street  
Phoenix, Arizona 85007

7 Ernest Johnson, Director  
8 Utilities Division  
ARIZONA CORPORATION COMMISSION  
9 1200 West Washington Street  
Phoenix, Arizona 85007

10 All parties of record on the service list

11  
12  
13 By 

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