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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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AZ CORP COMMISS
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IN THE MATTER OF THE INVESTIGATION OF
THE COST OF TELECOMMUNICATIONS
ACCESS

Docket No. T-00000D-00-0672

**COX ARIZONA TELCOM'S
COMMENTS ON PROCEDURAL ISSUES**

Cox Arizona Telcom, LLC ("Cox") submits the following comments in response to the request of Judge Nodes at the October 14, 2003 procedural conference in this docket. Although several issues were raised at the procedural conference, Cox is confining its comments to the bifurcation issue. In sum, Cox believes that the proceedings should be bifurcated so that Qwest's access charges are addressed in the first phase of the proceeding and access charges of other ILECs are considered in the second phase. CLEC access charges should not be addressed in the first two phases; rather, they could be considered at a later date, either in a third phase of this docket or in a separate docket.

First, in light of the Commission's directive in the 271 Proceeding to promptly address Qwest's access charges, only Qwest's charges should be considered in the first phase of this docket. Attempting to address the access charges of other ILECs or CLECs in this phase would unnecessarily complicate the docket and slow the resolution of appropriate Qwest's charges. Although there may be some generic overarching policy issues that arise in the first phase, Cox submits that those issues can be considered without having to address the specific charges for numerous ILECs and CLECs with potentially significantly different circumstances. Moreover, as has already been acknowledged, determining proper access charges for independent telecommunication companies raises many issues that are not relevant to Qwest or most CLECs. Conducting a Qwest-only phase first will result in a less complicated proceeding with a more timely resolution.

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