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MARC SPITZER  
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Arizona Corporation Commission

DOCKETED

AZ CORP COMMISSION  
DOCUMENT CONTROL

MAR - 2 2004

DOCKETED BY

IN THE MATTER OF QWEST  
CORPORATION'S FILING AMENDED  
RENEWED PRICE REGULATION PLAN.

DOCKET NO. T-01051B-03-0454

IN THE MATTER OF THE  
INVESTIGATION OF THE COST OF  
TELECOMMUNICATIONS ACCESS.

DOCKET NO. T-00000D-00-0672

SUPPLEMENT TO QWEST  
CORPORATION'S RESPONSE TO  
AT&T'S MOTION TO COMPEL

On November 28, 2003, AT&T of the Mountain States, Inc. ("AT&T") filed a motion to compel in the above-captioned Access Charge Docket (Docket No. T-00000D-00-0672). On December 15, 2003, Qwest Corporation ("Qwest") filed a response to that motion. On December 24, 2003, AT&T filed a reply in support of its motion. Both parties requested that oral argument be set on the motion.

On February 23, 2004, the Arizona Corporation Commission ("Commission") held a pre-hearing conference in the Renewed Price Regulation Plan Docket (Docket No. T-01051B-03-0454) for the purpose of scheduling a hearing on Qwest's proposed modified price cap plan and access charges. At that time the Commission consolidated that Access Charge Docket with the Renewed Price Regulation Plan Docket. On February 25, 2004, the Administrative Law Judge assigned to the matter issued a procedural order scheduling oral argument on AT&T's motion to compel and ordered that AT&T and Qwest file any updated information relative the motion by March 2,

1 2004.

2 At the time it responded to AT&T's motion to compel, Qwest objected to  
3 providing AT&T with information pertaining to interexchange services as wholly  
4 irrelevant to the Access Charge Docket, which, on its own, was established to determine  
5 whether current access charges reflect the cost of access. However, in light of the  
6 Commission's consolidation of that docket with the Renewed Price Regulation Plan  
7 Docket, the scope of these proceedings has been broadened and Qwest no longer objects  
8 to providing this information to AT&T insofar as the information relates only to Qwest,  
9 and to the extent that Qwest did not object to these data requests on other grounds, such  
10 as overly broad, requiring a special study, or being unduly burdensome.

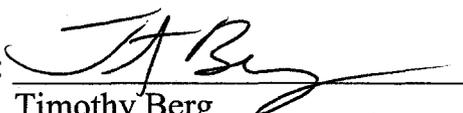
11 Qwest also continues to object to providing any such information regarding its  
12 affiliates for the reasons set forth in its December 15, 2003 response. Affiliates of Qwest  
13 are separate and distinct corporate entities over which Qwest has no authority or control.  
14 To the extent that Qwest has any information concerning these affiliates, such  
15 information is supplied directly by the affiliate subject to the same limitations as  
16 information it receives from other entities with which it does business, including CLECs  
17 like AT&T. Release of such information is not within Qwest's "control;" rather, it is  
18 controlled by the third-party entity itself. It is that entity that determines whether such  
19 information is publicly available or confidential. AT&T itself has objected to the release  
20 of information it has provided to Qwest in similar circumstances. AT&T, of course,  
21 remains free to seek such information directly from those entities.

22 Additionally, although Qwest has no objection to providing its own information in  
23 response to AT&T's data requests, such requests may be premature at this juncture of the  
24 proceedings. Qwest has not yet made any pricing proposal in this docket. Pursuant to  
25 Decision No. 66772, Qwest will make an A.C.C. R14-2-103 filing in this matter. To the  
26 extent this filing includes a revised proposal for access charges, the discovery currently

1 undertaken by AT&T may be irrelevant and outdated. At the time Qwest makes its  
2 A.C.C. R14-2-103 filing, all parties will be able to conduct discovery on the proposals  
3 actually made by Qwest and the supporting cost information for such proposals. It seems  
4 cumulative and premature to request such cost and price information prior to that filing.

5 RESPECTFULLY SUBMITTED this 2<sup>nd</sup> day of March, 2004.

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24 ORIGINAL and 15 copies hand-delivered for  
25 filing this 2<sup>nd</sup> day of March, 2004 to:

26 Docket Control  
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1 COPY of the foregoing delivered  
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- 13 Estacada, OR 97023-000
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- 15 San Carlos Apache Telecommunications Utility, Inc.  
PO Box 701  
245 S. Hill  
Globe, AZ 85502
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- 17 Accipiter Communications, Inc.  
2238 W. Lone Cactus Dr., Ste.100  
Phoenix, AZ 85027
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- 19 South Central Utah Telephone Association, Inc.  
PO Box 226  
Escalante, UT 84726-000
- 20
- 21 Southwestern Telephone Co., Inc.  
PO Box 5158  
Madison, WI 53705-0158
- 22
- 23 Centruytel  
PO Box 4065  
Monroe, LA 71211-4065
- 24
- 25 Table Top Telephone Co, Inc.  
600 N. Second Avenue  
Ajo, AZ 85321-0000
- 26

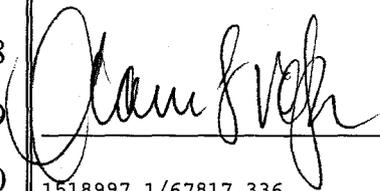
- 1 Citizens Utilities Rural Co. Inc.  
Citizens Communications Co. of Arizona
- 2 4 Triad Center, Suite 200  
Salt Lake City, UT 84180
- 3
- 4 Valley Telephone Cooperative, Inc.  
752 E. Malley Street  
PO Box 970
- 5 Willcox, AZ 85644
- 6 Copper Valley Telephone, Inc.  
PO Box 970
- 7 Willcox, AZ 85644
- 8 Midvale Telephone Exchange  
PO Box 7
- 9 Midvale, ID 83645
- 10 AT&T Communications of the Mountain States, Inc.  
1875 Lawrence Street, Room 1575
- 11 Denver, CO 80202
- 12 Navajo Communications Co., Inc.  
4 Triad Center, Suite 200
- 13 Salt Lake City, UT 84180
- 14 Brooks Fiber Communications of Tucson, Inc.  
201 Spear Street, 9<sup>th</sup> Floor
- 15 San Francisco, CA 94105
- 16 Citizens Telecommunications Co. of the White Mountains, Inc.  
4 Triad Center, Ste. 200
- 17 Salt Lake City, UT 84180
- 18 Max-Tel Communications, Inc.  
105 N. Wickham
- 19 PO Box 280  
Alvord, TX 76225
- 20
- 21 Comm South Companies, Inc.  
2909 N. Buckner Blvd., Ste. 200  
Dallas, TX 75228
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- 23 MCI WorldCom Communications  
201 Spear Street, 9<sup>th</sup> Floor  
San Francisco, CA 94105
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4 San Francisco, CA 94105
- 5 Digital Services Corp.  
211 N. Union Street, Ste. 300  
6 Alexandria, VA 22314
- 7 North County Communications Corporation  
3802 Rosencrans, Ste. 485  
8 San Diego, CA 92110
- 9 Electric Lightwave, Inc.  
4 Triad Center, Ste. 200  
10 Salt Lake City, UT 84180
- 11 One Point Communications  
Two Conway Park  
12 150 Field Drive, Ste. 300  
Lake Forest, IL 60045
- 13 Eschelon Telecom of Arizona, Inc.  
14 730 Second Avenue South, Ste. 1200  
Minneapolis, MN 55402
- 15 Global Crossing Local Services, Inc.  
16 180 South Clinton  
Rochester, NY 14646
- 17 Global Crossing Telemangement, Inc.  
18 180 South Clinton  
Rochester, NY 14646
- 19 Rhythm Links, Inc.  
20 9100 E. Mineral Circle  
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- 21 Intermedia Communications, Inc.  
22 3608 Queen Palm Drive  
Tampa, FL 33619-1311
- 23 Sprint Communications Company, L.P.  
24 6860 W. 115<sup>th</sup>, MS:KSOPKD0105  
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- 1 TCG Phoenix  
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- 2 Denver, CO 80202
- 3 Level 3 Communications, LLC  
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- 4 Broomfield, CO 80021
- 5 The Phone Company/Network Services of New Hope  
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- 6 New Hope, PA 18938
- 7 Verizon Select Services Inc.  
6665 MacArthur Blvd, HQK02D84
- 8 Irving, TX 75039
- 9 XO Arizona Inc.  
3930 Watkins, Ste. 200
- 10 Phoenix, AZ 85034
- 11 Alliance Group Services, Inc.  
1221 Post Road East
- 12 Westport, CT 06880
- 13 Nextlink Long Distance Svcs.  
3930 E. Watkins, Ste. 200
- 14 Phoenix, AZ 85034
- 15 Archtel, Inc.  
1800 West Park Drive, Ste. 250
- 16 Westborough, MA 01581  
One Point Communications
- 17 Two Conway Park, #300  
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- 18 Opex Communications, Inc.  
500 E. Higgins Rd., Ste. 200
- 19 Elk Grove Village, IL 60007
- 20 Pac-West Telecomm, Inc.  
1776 W. March Lane, #250
- 21 Stockton, CA 95207
- 22 Ernest Communications, Inc.  
6475 Jimmy Carter Blvd., Ste. 300
- 23 Norcross, GA 30071
- 24 RCN Telecom Services, Inc.  
105 Carnegie Center
- 25 Princeton, NJ 08540
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- 1 Single Billing Services, Inc.  
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- 2 El Monte, CA 91731
  
- 3 Special Accounts Billing Group  
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- 5 Joan S. Burke  
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- 7 Touch America
- 8 130 N. Main Street  
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- 9 VYVX, LLC
- 10 One Williams Center, MD 29-1  
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- 11 Western CLEC Corporation
- 12 3650 131<sup>st</sup> Avenue SE, Ste. 400  
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- 13 Williams Local Network, Inc.
- 14 One Williams Center, MD 29-1  
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- 15 North County Communications Corporation
- 16 3802 Rosencrans, #485  
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