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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF THE NOTICE
OF PROPOSED AMENDMENTS TO
THE UNIVERSAL SERVICE FUND

DOCKET NO. RT-00000H-97-0137

**QWEST CORPORATION'S
COMMENTS IN RESPONSE TO THE
ARIZONA LOCAL EXCHANGE
CARRIERS ASSOCIATION'S
PROPOSAL FOR AMENDING THE
ARIZONA UNIVERSAL SERVICE
FUND RULES AND REQUEST FOR
PROCEDURAL SCHEDULE**

Qwest Corporation ("Qwest") submits these comments in response to the Arizona Local Exchange Carriers Association's Proposal for Amending the Arizona Universal Service Fund Rules ("Proposed Amendments"). These comments are intended to raise only general policy concerns about the Proposed Amendments. Qwest will file other comments focusing on the language and details of the Proposed Amendments at a later point in this Docket.

BACKGROUND

On September 22, 1989, the Arizona Corporation Commission (the "Commission") issued rules governing the Arizona Universal Service Fund ("AUSF"). On April 26, 1996, the AUSF Rules were superceded by the current AUSF Rules as codified in Arizona Administrative Code R14-2-1201, *et seq.* Rule 14-2-1216 required that the Utilities Division Staff commence a thorough review of the AUSF Rules within three years of their effective date, and to provide the Commission with any recommended changes. On March 14, 1997, Docket No. RT-00000H-97-0137 was opened to address any proposed

1 changes to the AUSF Rules.

2 Following the opening of the docket, various parties submitted comments and a
3 workshop was held. In response to the Utilities Division Staff's further solicitation of
4 comments, ALECA has proposed several changes to the Rules.

5 **PROPOSED ARIZONA UNIVERSAL SERVICE FUND RULE AMENDMENTS**

6 Qwest believes that the Proposed Amendments raise many significant issues
7 concerning the proper operation of the AUSF on a going-forward basis, particularly in the
8 context of an increasingly competitive market for telecommunications in this State. Any
9 amendments adopted by the Commission must meet the goals of competitive neutrality
10 and equal treatment of all providers called upon to serve unserved or underserved areas.

11 Qwest recognizes that the AUSF is an essential source of funding that ensures that
12 rural telecommunications customers receive the supported telecommunications services at
13 reasonable rates. In order for the AUSF to be successful in fulfilling its stated purpose
14 and to meet the goal of enhancing competitive choice for telecommunications customers
15 throughout the State, there are a number of general policies that must guide any
16 amendment of the Rules:

- 17 1. The AUSF should be restricted to supporting one primary line per eligible
18 telecommunications carrier ("ETC") per address and the supported services
19 should not be expanded beyond basic single-line voice grade service. Since
20 the primary purpose of the AUSF is to provide basic access to the
21 telecommunications customers for whom cost-based rates would result in a
22 prohibitive cost of telecommunications service, the financial assistance
23 provided by the fund should be limited to basic single-line service needed to
24 access basic telecommunications service.
- 25 2. The size of the AUSF should be carefully monitored to prevent the
26 unnecessary accrual of funds. This can best be achieved by supporting only

1 a single line per household per ETC, by only providing support for rates that
2 exceed the Commission-determined benchmark as discussed below, and by
3 not expanding the scope of the supported services. Given the focused nature
4 of the assistance to be provided by the AUSF, the Commission must ensure
5 that the funds collected for the AUSF are only the amount needed to provide
6 basic service to legitimate high-cost customers. If the AUSF is structured in
7 a way that provides significantly more support than is needed for its
8 intended purpose, then the remaining majority of telecommunications
9 customers in the State will pay more than is justifiably necessary for the
10 telecommunications services they receive. The AUSF should be limited to
11 only the necessary and appropriate level of funds. A benchmark that is set
12 too low and a fund that assumes any reduction in the Federal Universal
13 Service Fund ("FUSF") without recovery first in local rates, as would be the
14 case in the proposed rules, will create an enormous and unnecessarily
15 burdensome state fund.

16 3. The source of the funding of the AUSF should be based on a method that
17 requires all exchange telephone carriers operating in Arizona to contribute in
18 an equitable and non-discriminatory manner – it should be sustainable and
19 competitively and technologically neutral. Carriers operating wireline,
20 wireless, and cable telephony should all contribute to the AUSF (and
21 potentially receive funds from it), in an equal manner. The contributions
22 could be based on total retail telecommunications intrastate revenue. To
23 arbitrarily assess 50% of the collection burden on traditional long distance
24 carriers, as is currently the case, is not a sustainable methodology, given the
25 massive reduction in long distance volumes that presumably have resulted
26 from wireless competition. If AUSF assessments apply to only some

1 telecommunications services or to only select providers of those services,
2 the customers of those select providers will be negatively impacted since
3 their providers will have been placed at a significant competitive
4 disadvantage. The Commission should therefore fund the AUSF in a broad-
5 based, competitively neutral manner so that all intrastate customers and
6 carriers contribute to the Fund.

7 4. The AUSF process should focus initially on the responsibility of carriers to
8 recover the cost of service from the end-user customer. At the present time,
9 rates for basic residential service and basic business services vary among
10 providers. As a starting point for the determination of the need for and level
11 of AUSF support, the Commission must determine an appropriate level of
12 cost to be borne by the end-user customer. In high-cost areas, it is
13 appropriate to recover a portion of the additional costs, as an increment to
14 the statewide average rate, from the end-user customers. This approach
15 allows the rate levels to better reflect the economic realities of providing
16 service in high-cost areas and provide the proper economic signals to the
17 marketplace. The Commission should balance the level of affordability and
18 the high cost of service as suggested by Qwest below.

19 5. ETCs should only be eligible for AUSF support to the extent the rate for
20 basic service in the high-cost area meets or exceeds a Commission
21 determined affordability benchmark. Qwest recommends that the
22 benchmark rate be set at 125% of the weighted average of all Arizona
23 residence and business basic exchange rates plus the federal end-user line
24 charge. Thus, in situations where a local exchange carrier believes that its
25 local rates are not compensatory, even though the rates meet or exceed the
26 Commission's affordability benchmark, the carrier should file a rate case or

1 earnings investigation with the Commission. The Commission can then
2 determine whether the carrier should receive funding from the AUSF to
3 reduce what would otherwise be local rates above the benchmark while also
4 considering the level of funding the carrier is receiving from the FUSF. In
5 addition to providing the Commission with a way to determine the
6 compensability of local rates, an earnings investigation will also provide
7 accountability and assist in preventing an uncontrollable fund.
8 Alternatively, the Commission's rules could provide a simplified
9 mechanism by which, under outlined conditions, an ETC can make a
10 simplified filing of rate of return on fair value rate base, which would be
11 subject to Commission review. This would avoid the considerable cost of
12 preparing a full rate case by the carrier or review by the Commission.

13 6. Any AUSF support determination should take into account the FUSF high-
14 cost fund monies available to the carrier before administering any AUSF
15 support.¹ In order to assure that carriers receive needed cost support but do
16 not double recover costs of service, it is appropriate that any AUSF provided
17 be net of any federal universal service funding related to high-cost
18 customers. If the FUSF support to an ETC is reduced, the carriers must first
19 look to restructure rates. To the extent that restructured rates exceed the
20 benchmark, an ETC would be eligible for (additional) AUSF upon
21 commission review of its application.

22 7. The AUSF should be a uniform mechanism that treats rural and non-rural
23 carriers alike. The purpose of the AUSF is to ameliorate the cost of

24 ¹ The calculation of AUSF should take into account federal USF from the Rural High Cost fund,
25 the Non-Rural High Cost Fund, and the Local Switching Support Fund. These three funds
26 directly offset the state revenue requirements of carriers and should be considered in the
calculation of AUSF support. Other federal USF programs provide offsets for interstate revenue
requirements and/or revenues and do not need to be considered in the calculation of AUSF.

1 providing service to high-cost customers. ALECA has proposed differential
2 mechanisms for AUSF funding for carriers based on their size. This is
3 simply inappropriate. Since the focus of AUSF funding is high-cost
4 customers, AUSF support should be available to maintain affordable rates
5 for similarly situated customers in high-cost areas for any carrier serving
6 those customers, regardless of whether the carrier is large or small, urban or
7 rural. The identity of the carrier providing service should be irrelevant; it is
8 the identity of the customer as a high-cost customer that should drive
9 eligibility for AUSF support.

10 8. Qwest requests that the Commission reject ALECA's proposed change to
11 the definition of the AUSF support area – which mirrors the support area or
12 areas identified by the FCC for the FUSF. ALECA's proposal would deny
13 the Commission any discretion in determining the AUSF support area. The
14 consequence of this proposed change would place the burden of covering
15 any reduction in the FUSF or any cost increase caused by a change in the
16 Federal or Arizona rules governing the AUSF support area on the AUSF.
17 Rule changes regarding the support area do not justify an increase in AUSF.
18 However, ALECA's proposal to link the AUSF's defined support area to the
19 FUSF's defined support area, if accepted by the Commission, would result
20 in an unjustifiable and inappropriate increase. Instead, Qwest requests that
21 the support area should be determined by the Commission on a wire center
22 basis.

23 9. There should be parity with regard to the regulatory oversight of all ETCs.
24 For example, Qwest believes that service quality rules developed to regulate
25 monopolists decades ago are no longer necessary in today's competitive
26 environment. However, if the Commission maintains its service quality

1 rules, those rules should be applied equitably to all ETCs' basic universal
2 service offerings for purposes of ETC designation and obligations. The
3 competitive playing field must be level, regardless of the technology
4 involved.

5 10. Any AUSF changes adopted by the Commission must take into account
6 significant changes in intercarrier compensation that will likely be occurring
7 in the next few years. As access charge revenues diminish, local rates will
8 have to rise. The AUSF mechanisms must be able to accommodate these
9 changes to the extent that local rates exceed the 125% benchmark.

10 11. The telecommunications industry landscape has changed dramatically since
11 the introduction of the Telecom Act of 1996. Technology is evolving
12 rapidly and competition is flourishing in Arizona. Historically, business
13 lines have provided an implicit subsidy to residential lines. However, more
14 and more business lines are now being served by competitors who are under
15 no obligation to serve customers in high-cost areas and as such do not have
16 to make the sizable expenditures to reach those customers. One method for
17 dealing with this unusual and inequitable paradigm is the use of one-time
18 USF distributions to help fund the cost of serving high-cost customers. This
19 methodology would equalize treatment for carriers who do not receive
20 ongoing draws from the USF.

21 a. In high-cost situations, one-time USF distributions may be used to
22 extend facilities to serve potential customers not presently receiving
23 service and for the amelioration of inadequate service. In general, one-
24 time USF distributions would not be used to extend facilities to serve
25 vacation or seasonal dwellings.

26 b. The administrative requirements associated with one-time USF

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distributions should be kept to a minimum.

- c. The requirement to provide line extension allowances for end users, at different compensatory levels within the State of Arizona is yet another indication of the Commission's inability to level the playing field in an environment where market conditions warrant certain levels of parity. Requiring Qwest to pay for the first \$3,000 for line extension to an end user not previously served at an address while requiring a competitor or smaller LEC or rural LEC to only pay a fraction of Qwest's allowance for a similarly situated end user does not appear to even resemble the parity standards that Qwest is held to in other areas of the business. It has the unintended effect of disincenting other carriers' investment in high-cost areas. (With the greater obligation to build squarely placed on Qwest's shoulders, competitive carriers will take advantage of facilities obtained on an unbundled basis at low cost and without the need for investment in facilities.) Simply put, similarly situated customers served by different companies in different parts of the state should pay similar amounts for line extension.
- d. Unless otherwise ordered by the Commission, the maximum one-time USF distribution should be no more than an economically justifiable set amount. (For example, for rate-of-return regulated companies in Utah that amount is no more that \$10,000 per customer.)

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CONCLUSION

To the extent that the Proposed Amendments conflict with the comments set forth herein, Qwest respectfully requests that the Commission consider Qwest's comments before deciding how to amend the AUSF Rules and reject those portions of the Proposed Amendments that are inconsistent with these comments.

RESPECTFULLY SUBMITTED this 1st day of July, 2005.

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5	ALLCOM / ALLCOM INTERNATIONAL 10390 COMMERCE CENTER DR, SUITE 250 RANCHO CUCAMONGA CA 31730-	ALLEGIANCE TELECOM OF ARIZONA, 9201 N. CENTRAL EXPRESSWAY 6B DALLAS TX 75231-
6		
7	ALLIANCE BEVERAGE DIST. CO. 1115 N. 47TH AVE. PHOENIX AZ 85043-	ALLIANCE GROUP SERVICES, INC. 1221 POST ROAD EAST WESTPORT CT 06880-
8		
9	ALLTEL COMMUNICATIONS, INC ONE ALLIED DRIVE LITTLE ROCK AR 72202-	ALPHA TELCOM, INC. 2751 HIGHLAND AVENUE GRANTSPASS OR 97526-
10		
11	ALTERNATEL 6860 WEST 115TH STREET, MS:KSOPKDO105 OVERLAND PARK KS 66211-	AMERICA NET, LLC 3435 WILSHIRE BLVD., STE. 1090 LOS ANGELES CA 90001-
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13	AMERICAN FIBER SYSTEMS, INC. 100 MERIDIAN CENTRE, STE. 250 ROCHESTER NY 14618-	AMERICAN GENERAL PAYPHONE 3116 E. SHEA BLVD. #252 PHOENIX AZ 85028-
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21	APP TELEMANAGEMENT LLC 12022 N. 55TH STREET SCOTTSDALE AZ 85254-	AR COMMUNICATIONS 2366 WEST SHANNON STREET CHANDLER AZ 85224-
22		
23	ARBROS COMMUNICATIONS LICENSING 1 100 WAYNE AVE., 8TH FLOOR SILVER SPRINGS MD 20910-	ARIZONA COIN TELEPHONE, INC. 955 E. EVENINGSTAR LANE TEMPE AZ 85283-
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CHANDLER AZ 85226- | ARIZONA PAYPHONE COMPANY
P. O. BOX 31002
PHOENIX AZ 85046- |
| 3 | ARIZONA TELEPHONE COMPANY
P. O. BOX 5158
MADISON WI 53705- | ARIZONA VENDING MACHINES
3919 E. HIGHLAND AVE.
PHOENIX AZ 85018- |
| 5 | ARNAN LLC
3910 N. GRAND AVE.
PHOENIX AZ85019- | ASIAN AMERICAN ASSOCIATION /
9550 FLAIR DRIVE, STE. 203
EL MONTE CA 91731- |
| 7 | ASSOCIATION ADMINISTRATORS, INC.
6455 E. JOHNS CROSSING, SUITE 285
DULUTH GA 30097- | AT&T COMMUNICATIONS OF THE
795 FOLSOM STREET, ROOM 2160-E
SAN FRANCISCO CA 94107- |
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482 NORRISTOWN RD., SUITE 200
BLUE BELL PA 19422- | AVS, INC.
1833 E. BASELINE ROAD, SUITE 253
GILBERT AZ 85233- |
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2011 N. SCOTTSDALE ROAD
SCOTTSDALE AZ 85257- |
| 13 | BCGI COMMUNICATIONS CORP.
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WOBURN MA 01801- | BEALS PAY PHONES, L.L.C.
516 W. ENCANTO BLVD.
PHOENIX AZ 85003- |
| 15 | BELLSOUTH LONG DISTANCE INC.
400 PERIMETER CENTER TERRACE,
ATLANTA GA 30346- | BLACKSTONE COMMUNICATIONS
11600 N. W. 34TH STREET
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AUSTIN TX 78746- |
| 21 | BROADWING TELECOMMUNICATIONS,
1122 CAPITAL OF TEXAS HWY SOUTH
AUSTIN TX 78746- | BROOKS FIBER COMMUNICATIONS
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SAN FRANCISCO CA 94105- |
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5566 SOUTHWYCK BLVD
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PHOENIX AZ 85009- | BUSINESS DISCOUNT PLAN, INC.
ONE WORLD TRADE CENTER, #800
LONG BEACH CA 90831- |
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| 3 | BUYERS UNITED INTERNATIONAL, INC.
14870 S. PONY EXPRESS RD.
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6409 COLLEYVILLE BLVD. PO BOX 1170
COLLEYVILLE TX 76034- |
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8219 LEESBURG PIKE
VIENNA VA 22182- | CABLE & WIRELESS USA, INC.
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VIENNA VA 22182- |
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| 7 | CALL SOLUTIONS, INC.
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197 JOAQUIN CIRCLE
DANVILLE CA 94526- |
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ATLANTA GA 30339- | CIMCO COMMUNICATIONS, INC.
18 WEST 100 22ND STREET, SUITE 109
OAKBROOK TERRACE IL 60181- |
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| 19 | CITIZENS LONG DISTANCE COMPANY
180 S. CLINTON AVE., 3RD FLOOR
ROCHESTER NY 14646- | CLEAR WORLD COMMUNICATIONS
3100 SOUTH HARBOR BLVD #300
SANTA ANA CA 92704- |
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| 21 | COAST INTERNATIONAL, INC
14303 W. 95TH STREET
LENEXA KS 66215- | COGENT COMMUNICATIONS OF
1015 31ST STREET, N.W.
WASHINGTON DC 20007- |
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| 23 | COIN PHONE MANAGEMENT COMPANY
1846 CARGO CT.
LOUISVILLE KY 40299- | COINTEL TELCOM PLUS
183 5 1 ST AVENUE
SAFFORD AZ 85546- |
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| 25 | COLORADO DATA SYSTEM
1910 E. KAREN DRIVE
PHOENIX AZ 85022- | COMCAST LONG DISTANCE
650 CENTERTON ROAD
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5301 MARYLAND WAY
BRENTWOOD TN 37027- | COMM SOUTH COMPANIES INC.
6830 WALLING LANE
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20033 DETROIT RD. ANNEX STE. 202
ROCKY RIVER OH 44116- | COMMUNITY PAYPHONES
P. O. BOX 86143
TUCSON AZ 85754- |
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5535 S. SPENCER AVE.
TUCSON AZ 85746- | COM-TECH INC.
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11911 FREEDOM DRIVE, 11TH FLOOR
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MESA AZ 85202- |
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| 26 | | |

1	CYBERTEL COMMUNICATIONS 2820 LA MIRADA DR., STE. H VISTA CA 92083-	D. M. MOTEL 2125 S. CRAYCROFT ROAD TUCSON AZ 85711-
2		
3	D.D.D. CALLING, INC. 6300 RICHMOND AVENUE, SUITE 304 HOUSTON TX 77057-	DANCRIS TELECOM, L.L.C. 6900 EAST CAMELBACK ROAD, SUITE 1003 SCOTTSDALE AZ 82251-
4		
5	DAVE FREMONT %CHATEAU GARDENS APARTMENTS 6105 N. 59TH AVE. GLENDALE AZ 85301-	DESERT TELECOM 899 RODEO DRIVE BRAWLEY CA 92227-
6		
7	DIAL - THRU, INC. 700 S. FLOWER ST. #2950 LOS ANGELES CA 90017-	DIAMONDBACK PAYPHONE 5458 W. MOHAWK LN. GLENDALE AZ 85308-
8		
9	DILLON ENTERPRISES 14490 E. ELGIN ST. GILBERT AZ 85296-	DIRECTDIAL USA 62975 BOYD ACRES ROAD, STE. 2 BEND OR 97701-
10		
11	DISCOUNT NETWORK SERVICES, INC. 23750 ELMIRA REDFORD MI 48239-	DISCOUNT PLUS STE 202 6053 HUDSON RD., STE. 110 WOODBURY MN 55125-
12		
13	DISCOUNT UTILITIES, LLC P.O. BOX 839 MONTICELLO IN 47960-	DMJ COMMUNICATIONS, INC. 2525 N. GRANDVIEW, STE. 900 ODESSA TX 79761-
14		
15	DOC & EDDY'S 3715 E. KACHINA DR. PHOENIX AZ 85044-	DSLNET COMMUNICATIONS, LLC 545 LONG WHARF DRIVE, 5TH FLOOR NEW HAVEN CT 06511-
16		
17	D-TEL COMMUNICATIONS 12313 S. WILMINGTON AVENUE COMPTON CA 90222-	E.SPIRE 7125 COLUMBIA GATEWAY DRIVE, STE. 200 COLUMBIA MD 21046-
18		
19	EASTON TELECOM SERVICES, INC. 3046 BRECKSVILLE RD. #A RICHFIELD OH 44286-	EL PASO GLOBAL NETWORKS 1001 LOUISIANA STREET, N1835A HOUSTON TX 77002-
20		
21	EL PASO NETWORKS, L.L.C. 1001 LOUISIANA STREET, N1 835A HOUSTON TX 77002-	ELECTRIC LIGHTWAVE, INC. 4 TRIAD CENTER, STE. 200 SALT LAKE CITY UT 84180-
22		
23	ENCOMPASS COMMUNICATIONS, L.L.C. 119W. TYLER, STE. 260 LONGVIEW TX 75601-	ENHANCED COMMUNICATIONS GROUP 312 SE DELAWARE AVE. BARTLESVILLE OK 74003-
24		
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1	EQUALNET CORPORATION 1250 WOOD BRANCH PARK DRIVE HOUSTON TX 77079-	ERBIA NETWORK, INC. 1483 CHAIN BRIDGE ROAD, SUITE 300 MCLEAN VA 22101-
3	ERNEST COMMUNICATIONS, INC. 6475 JIMMY CARTER BLVD., SUITE 300 NORCROSS GA 30071-	ESCHELON TELECOM OF ARIZONA, INC. 730 SECOND AVENUE SOUTH SUITE MINNEAPOLIS MN 55402-
5	ESSENTIAL.COM, INC - YOUR ENERGY & UNITED SYSTEMS ACCESS TELECOM 5 BRAGDAN LANE, KENNEBUNK ME 04043-	ETI - TELECOMMUNICATIONS 9500 TOLEDO WAY IRVINE CA 92618-
8	EVERCOM SYSTEMS, INC. 8201 TRISTAR DRIVE IRVING TX 75024-	EXCELL AGENT SERVICES, L.L.C. 1919 W. FAIRMONT, STE. 10 TEMPE AZ 85282-
10	EXPRESS TEL 324 SOUTH STATE, STE. 125 SALT LAKE CITY UT 84111-	EZ TALK COMMUNICATIONS, L.L.C. 4727 SOUTH MAIN STAFFORD TX 77477-
12	EZTEL NETWORK SERVICES, L.L.C. P. O. BOX 1006 INDIANOLA MS 38751-	FAMOUS SAM'S 307 (J) S. BEELINE HIGHWAY PAYSON AZ 85541-
14	FAMOUS SAM'S #14 2052 S. 4TH AVE. YUMA AZ 85364-	FAMOUS SAM'S #15 2239 E. FRY BLVD. SIERRA VISTA AZ 85635-
16	FAMOUS SAM'S #8 7970 E. SPEEDWAY #170 TUCSON AZ 85710-	FEDERAL TRANSTEL, INC. 2868 ACTON ROAD, SUITE 100 BIRMINGHAM AL 35243-
18	FIRSTWORLD COMMUNICATIONS, INC. 6080 GREENWOOD PLAZA BLVD. GREENWOOD VILLAGE CO 80111-	FLOWING WELLS TEXACO 1380 W. PRINCE TUCSON AZ 85705-
20	FORTUNA DE ORO R.V. RESORT 13650 N. FRONTAGE ROAD YUMA AZ 85367-	FREEDOM COMMUNICATIONS CORP. 2765 CARDINAL CIRCLE GULF STREAM FL 33483-
22	FREEDOMSTARR COMMUNICATIONS, 8730 SUNSET BLVD., #700 WEST HOLLYWOOD CA 90069-	FRONTIER CITIZENS UTILITIES RURAL 4 TRIAD CENTER, STE. 200 SALT LAKE CITY UT 84180-
24	FRONTIER COMMUNICATIONS OF THE 4 TRIAD CENTER, STE. 200 SALT LAKE CITY UT 84180-	GASLIGHT THEATRE 7010 E. BROADWAY TUCSON AZ 85710-
26		

1	GATES COMMUNICATIONS, INC 1100 OLIVE WAY, # 951 SEATTLE WA 98101-	GCI 4141 38TH STREET SW STE D FARGO ND 58104-
3	GE BUSINESS PRODUCTIVITY 6540 POWERS FERRY ROAD ATLANTA GA 30339-	GENESIS COMMUNICATIONS 12750 HIGH BLUFF DRIVE, STE. 200 SAN DIEGO CA 92130-
5	GLOBAL CROSSING LOCAL SERVICES, 1080 PITTSFORD VICTOR RD. PITTSFORD NY 14534-	GLOBAL CROSSING NORTH AMERICAN 1080 PITTSFORD VICTOR RD. PITTSFORD NY 14534-
7	GLOBAL CROSSING 1080 PITT SFORD VICTOR RD. PITTSFORD NY 14534-	GLOBAL CROSSING TELEMAGEMENT, 1080 PITTSFORD VICTOR RD. PITTSFORD NY 14534-
9	GLOBAL TEL*LINK CORPORATION 2609 CAMERON STREET MOBILE AL 36607-	GLOBALCOM, INC. 333 W WACKER DRIVE 15TH FLOOR CHICAGO IL 60606-
11	GLYPHICS COMMUNICATIONS, INC. 66 EAST WADSWORTH PARK DRIVE, SUITE DRAPER UT 84020-	GOLDEN TEL, INC. 16200 STAGG STREET VAN NUYS CA 91406-
13	GOLF N STUFF 6503 E. TANQUE VERDE RD. TUCSON AZ 85715-	GOLFLAND ENTERTAINMENT CENTER, 155 W. HAMPTON AVENUE MESA AZ 85210-
15	GROUP LONG DISTANCE, INC. 9500 TOLEDO WAY IRVINE CA 92618-	GTC TELECOM 3151 AIRWAY AVENUE, SUITE P-3 COSTA MESA CA 92626-
17	HENDERSON APT. 1190 EAST CARMEN STREET TEMPE AZ 85283-	HJN TELECOM, INC. 3235 SATELLITE BLVD., BLDG. 400, STE. 300 DULUTH GA 30096-
19	HOLT AJO SALES, INC. 429 NORTH 2ND AVENUE AJO AZ 85321-	HOME PHONE, INC. 1095 HOME AVENUE AKRON OH 44310-
21	ICG TELECOM GROUP, INC. 161 INVERNESS DRIVE WEST, STE 100 ENGLEWOOD CO 80112-	IDT AMERICA, CORP. 520 BROAD STREET NEWARK NJ 07102-
23	IE COM 2912 LAKESIDE DR. OKLAHOMA CITY OK 73120-	IG2, INC. 80-02 KEW GARDENS ROAD, SUITE 5000 KEW GARDENS NY 11415-
25	ILD 5000 SAWGRASS VILLAGE CIRCLE, SUITE 30 PHONE VEDRA BEACH FL 32082-	1-LINK, COMMUNICATIONS, INC. 13751 S. WADSWORTH PARK DRIVE, STE. DRAPER UT 84020-

1	IMC/INFORMATION MANAGEMENT 1630 E. BRIARWOOD TERRACE	INET INTERACTIVE NETWORK 10990 WILSHIRE BLVD. #16
2	PHOENIX AZ 85283-	LOS ANGELES CA 90024-
3	INMATE COMMUNICATIONS 7107 VALJEAN AVENUE	INTERMEDIA COMMUNICATIONS, INC. ONE INTERMEDIA WAY
4	VAN NUYS CA 91406-	TAMPA FL 33647-
5	INTERNATIONAL PLUS 4380 BOULDER HIGHWAY	INTERSTATE TEXACO 2120 S. MILTON
6	LAS VEGAS NV 89121-	FLAGSTAFF AZ 86004-
7	INTER-TEL NETSOLUTIONS, INC. 1615 S. 52ND STREET	IONEX COMMUNICATIONS NORTH, INC. 15305 DALLAS PARKWAY, STE. 1500
8	TEMPE AZ 85281-	ADDISON TX 75001-
9	IPVOICE COMMUNICATIONS, INC. 5050 N. 19TH AVE., STE. 416	ITC^DELTACOM 4092 SOUTH MEMORIAL PARKWAY
10	PHOENIX AZ 85015-	HUNTSVILLE AL 35802-
11	JAMES JAY FRITTON 1135 N. CRAYCROFT ROAD	JIREHCOM LONG DISTANCE, INC. 3880 N. MAIN ST.
12	TUCSON AZ 85712-	EAST PEORIA IL 61611-
13	JMS ENTERPRISES 5212 CAMINO APOLENA	JOEY CAYS ENTERPRISES 15449 N. 25TH AVE., APT. 1030
14	TUCSON AZ 85718-	PHOENIX AZ 85023-
15	JULIO C. TANAHE P. O. BOX 1699	KDD AMERICA INC. 375 PARK AVENUE, 7TH FLOOR
16	DOUGLAS AZ 85608-	NEW YORK NY 10152-
17	KIGER TELEPHONE & TELEPHONY, LLC 999 18TH STREET, STE. 1825	KMC TELECOM V, INC. 1755 NORTH BROWN ROAD
18	DENVER CO 80202-	LAWRENCEVILLE GA 30043-
19	L & C PHONE SERVICES, INC. 190 W. CAMELBACK RD.	LA POSADA HOTEL 303 E. 2ND STREET
20	PHOENIX AZ 85013-	WINSLOW AZ 86047-
21	LAUNDRY WORLD 10645 NORTH TATUM BLVD, SUITE 200-148	LCR TELECOMMUNICATIONS, LLC 20439 MACK AVENUE
22	PHOENIX AZ 85028-	GROSS POINTE WOODS MI 48236-
23	LDA 8825 RAMBLEWOOD DRIVE #1509	LDC TELELCOMMUNICATIONS, INC. % INTERCONTROLLERS 3350
24	CORAL SPRINGS FL 33065-	TAMPA FL 33618-
25	LDMI LONG DISTANCE 8801 CONANT STREET	LEAST COST ROUTING, INC. 1700 OLD MEADOW ROAD, 3RD FLOOR
26	HAMTRAMCK MI 48211-	MCLEAN VA 22102-

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| 1 | LEGACY LONG DISTANCE | LEGACY TELECOMMUNICATIONS |
| 2 | ONE WORLD TRADE CENTER, SUITE 1 100 | 4706 SHAVANO OAK, SUITE 101 |
| 3 | LONG BEACH CA 90831- | SAN ANTONIO TX 78249- |
| 4 | LEVEL 3 COMMUNICATIONS, LLC | LIVEWIRE NET |
| 5 | 1025 ELDORADO BLVD. | 4577 PECOS STREET |
| 6 | BROOMFIELD CO 80021- | DENVER CO 80211- |
| 7 | LOCAL GATEWAY EXCHANGE, INC. | LONG DISTANCE BILLING |
| 8 | 700 N. PEARL, SUITE 200 | P. O. BOX 898 |
| 9 | DALLAS TX 75201- | TUSTIN CA 92781- |
| 10 | LONG DISTANCE CHARGES | LONG DISTANCE WHOLESALE CLUB |
| 11 | 2 VIA RAVENNA COURT | 8750 N CENTRAL EXPRESSWAY STE |
| 12 | HENDERSON NV 89011- | DALLAS TX 75231- |
| 13 | LOOKING GLASS NETWORKS, INC. | MA KNEW HER, INC. |
| 14 | 1111 W. 22ND STREET | 5 WEST BASELINE RD. |
| 15 | OAK BROOK IL 60523- | PHOENIX AZ 85041- |
| 16 | MAH COMMUNICATIONS, INC. | MAIN STREET TELEPHONE COMPANY |
| 17 | 151 KALMUS DRIVE, SUITE J-7 | % PATRICK CROCKER 900 |
| 18 | COMERICA | KALAMAZOO MI 49007- |
| 19 | COSTA MESA CA 92626- | MAXTEL USA, INC. |
| 20 | MAX-TEL COMMUNICATIONS, INC. | P. O. BOX 280 436 LYNCHBURG AVENUE |
| 21 | 105 N. WICKHAM | BROOKNEAL VA 24528- |
| 22 | ALVORD TX 76225- | MCI WORLDCOM NETWORK SERVICES, |
| 23 | MCI WORLDCOM COMMUNICATIONS, INC. | 201 SPEAR STREET, 9TH FLOOR |
| 24 | 201 SPEAR STREET, 9TH FLOOR | SAN FRANCISCO CA 94105- |
| 25 | SAN FRANCISCO CA 94105- | MCLEODUSA TELECOMMUNICATIONS |
| 26 | MCIMETRO | 6400 C STREET, P. O. BOX 3177 |
| 27 | 201 SPEAR STREET 9TH FLOOR | CEDAR RAPIDS IA 52406- |
| 28 | SAN FRANCISCO CA 94105- | METROMEDIA FIBER NETWORK |
| 29 | METRO VENDING OF ARIZONA, CO. | 360 HAMILTON AVENUE |
| 30 | P.O. BOX 28237 | WHITE PLAINS NY 10601- |
| 31 | TEMPE AZ 85285- | METROPOLITAN FIBER SYSTEMS OF |
| 32 | METROPHONE TELECOMMUNICATIONS, | 201 SPEAR STREET, 9TH FLOOR |
| 33 | 2020 - 124TH AVE. NE C-103 | SAN FRANCISCO CA 94105- |
| 34 | BELLEVUE WA 98005- | MOMENTUM TELECOM, INC. |
| 35 | MIDVALE TELEPHONE EXCHANGE, INC. | 3 100 KERNERE BLVD., STE. C |
| 36 | P. O. BOX 7 | SAN RAFAEL CA 94901- |
| 37 | MIDVALE ID 83645- | |

1	MOUNTAIN TELECOMMUNICATIONS, INC. 1430W. BROADWAY, SUITE A200	MPOWER COMMUNICATIONS CORP. 171 SULLY'S TRAIL, SUITE 202
2	TEMPE AZ 85282-	PITTSFORD NY 14534-
3	MTV WORLD PAYPHONES 8856 W. ECHO LANE	NAS 13650 DULLES TECHNOLOGY DRIVE
4	PEORIA AZ 85345-	HERNDON VA 20171-
5	NATIONAL BRANDS, INC. 4633 W. POLK ST.	NATIONAL PUBLIC PHONE CO. 4633 W. POLK STREET
6	PHOENIX AZ 85043-	PHOENIX AZ 85043-
7	NAVAJO COMMUNICATIONS COMPANY, 4 TRIAD CENTER, STE. 200	NETLOJIX TELECOM, INC 501 BATH STREET
8	SALT LAKE CITY UT 84180-	SANTA BARBARA CA 93101-
9	NETWORK BILLING SYSTEMS, L.L.C. 155 WILLOWBROOK BOULEVARD	NETWORK COMMUNICATIONS 1809 JUDSON RD.
10	WAYNE NJ 07470-	LONGVIEW TX 75605-
11	NETWORK ENHANCED TECHNOLOGIES, 700 S. FLOWER STREET, SUITE 420	NETWORK OPERATOR SERVICES, INC. P. O. BOX 3529
12	LOS ANGELES CA 90017-	LONGVIEW TX 75606-
13	NETWORK UTILIZATION SERVICES P.O. BOX 990-165	NETWORIP, LLC 119 WEST TYLER STREET, SUITE 168
14	BOSTON MA 02199-	LONGVIEW TX 75601-
15	NEW CENTURY TELECOM, INC. 8180 GREENSBORO DRIVE, SUITE 700	NEW EDGE NETWORKS 3000 COLUMBIA HOUSE BLVD.
16	MCLEAN VA 22102-	VANCOUVER WA 98661-,LLC
17	, LLC 2001 EDMUND HALLEY DRIVE	5020 N LAK A YUCCA
18	RESTON VA 20191-	TUCSON AZ 85743-
19	NORSTAN NETWORK SERVICES, INC. 5101 SHADY OAK ROAD	NORTH AMERICAN COMMUNICATIONS 789 PARK AVE. 2ND FLOOR
20	MINNETONKA MN 55343-	HUNTINGTON NY 11743-
21	NORTH COUNTY COMMUNICATIONS 3802 ROSENCRANS, SUITE 485	NOW COMMUNICATIONS, INC. 2000 NEWPORT PLACE PARKWAY, SUITE
22	SAN DIEGO CA 92110-	LAWRENCEVILLE GA 30043-
23	NSC COMMUNICATIONS PUBLIC 6920 KOLL CENTER PARKWAY, SUITE 211	NTS COMMUNICATIONS, INC. 5307 W. LOOP 289
24	PLEASANTON CA 94566-	LUBBOCK TX 79414-
25	OLS, INC. 1030 CAMBRIDGE SQUARE, SUITE E	OMEGA COM 7137 E. 32ND PLACE
26	ALPHARETTA GA 30201-	TUCSON AZ 85710-

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| 1 | ONCOR COMMUNICATIONS, INC..
3530 FOREST LANE, SUITE 200
DALLAS TX 75234- | ONE SOURCE COMMUNICATIONS
3920 E. HEATHER CT.
GILBERT AZ 85234- |
| 2 | | |
| 3 | ONESTAR LONG DISTANCE, INC.
7100 EAGLE CREST BLVD. SUITE B
EVANSVILLE IN 47715- | ONFIBER CARRIER SERVICES, INC.
7887 E. BELLEVIEW AVE., SUITE 820
ENGLEWOOD CO 80111- |
| 4 | | |
| 5 | OPEX COMMUNICATIONS, INC.
500 EAST HIGGINS ROAD, SUITE 200
ELK GROVE VILLAGE | OPTICOM
801 CONGRESSIONAL BLVD.
IL 60007- CARMEL IN 46032- |
| 6 | | |
| 7 | P.T.A.
2581 W. COUNTY 17 3/4 STREET
SOMERTON AZ 85350- | PACIFIC COIN
16200 STAGG STREET
VAN NUYS CA 91406- |
| 8 | | |
| 9 | PACIFIC COMMUNICATIONS
7170 W OAKLAND STREET
CHANDLER AZ 85226- | PAC-WEST TELECOMM, INC.
1776 W. MARCH LANE, #250
STOCKTON CA 95207- |
| 10 | | |
| 11 | PAETEC COMMUNICATIONS, INC.
ONE PAETEC PLAZA
FAIRPORT NY 14450- | PARAMOUNT INTERNATIONAL
600 2540 FORTUNE WAY
VISTA CA 92083- |
| 12 | | |
| 13 | PAUL ZEPEDA JR.
3005 VIA DE SUENOS
TUCSON AZ 85713- | PAXX TELECOM, LLC
14201 N. HAYDEN ROAD A3
SCOTTSDALE AZ 85260- |
| 14 | | |
| 15 | PAY PHONE NETWORK,
5306 N. 8TH AVE.
PHOENIX AZ 85013- | PAYPHONES PLUS INC.
1635 E. REDFIELD RD.
TEMPE AZ 85283- |
| 16 | | |
| 17 | PF.NET NETWORK SERVICES CORP
2941 FAIRVIEW PARK DRIVE
FALLS CHURCH VA 22042- | PHASE 2 TELESYSTEMS, INC.
8901 E. RAINTREE #100
SCOTTSDALE AZ 85260- |
| 18 | | |
| 19 | PHILMAR COMMUNICATIONS
4635 W. PORT AU PRINCE
GLENDALE AZ 85306- | PHONE CALLS, LLC
3734 E. ANNE STREET
PHOENIX AZ 85040- |
| 20 | | |
| 21 | PHONES FOR ALL / TELEFONOS PARA
14681 MIDWAY ROAD, SUITE 105
ADDISON TX 75001- | PHONE-SERV
2751 W. INA RD.
TUCSON AZ 85741- |
| 22 | | |
| 23 | PHONETEL TECHNOLOGIES, INC.
1001 LAKESIDE AVENUE, 7TH FLOOR,
CLEVELAND OH 44114- | PIRTLEVILLE GROCERY
P. O. BOX 6801
PIRTLEVILLE AZ 85626- |
| 24 | | |
| 25 | PNG TELECOMMUNICATIONS, INC.
100 COMMERCIAL DR. | POPP TELCOM INCORPORATED
620 MENDELSSOHN AVE. N |
| 26 | | |

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| 1 | FAIRFIELD OH 45014- | GOLDEN VALLEY MN 55427- |
| 2 | PREMIER INNS
2484 HOTEL CIRCLE PLACE | PREMIERE NETWORK SERVICES, INC.
1510N. HAMPTON ROAD, STE. 120 |
| 3 | SAN DIEGO CA 92108- | DESOTO TX 75115- |
| 4 | PRIMUS TELECOMMUNICATIONS, INC.
1700 OLD MEADOW DRIVE, 3RD FLOOR | PRINT TEL COMMUNICATIONS
2301 W. DAKOTA #1 |
| 5 | MCLEAN VA 22102- | TUCSON AZ 85746- |
| 6 | PROGRESSIVE PAY PHONES
9764 E. PASEO DEL TORNASOL | PROMISE-NET INTERNATIONAL, LTD.
2671 CENTERVILLE HIGHWAY |
| 7 | TUCSON AZ 85747- | SNELLVILLE GA 30078- |
| 8 | PROMISEVISION TECHNOLOGY, INC.
1050 E. 2ND STREET #212 | PT-1 COUNSEL, INC.
9775 BUSINESSPARK AVENUE |
| 9 | EDMOND OK 73034- | SAN DIEGO CA 92131- |
| 10 | PUBLIC COMMUNICATION SERVICES,
11859 WILSHIRE BOULEVARD, SUITE 600 | PUBLIC PHONE SYSTEMS
757 W. WARNER RD. |
| 11 | LOS ANGELES CA 90025- | TEMPE AZ 85284- |
| 12 | QUANTUM NETWORK SERVICES, INC.
P. O. BOX 1180 | QUANTUMLINK COMMUNICATIONS
3660 WILSHIRE BLVD. STE. 400 |
| 13 | LODI CA 95241- | LOS ANGELES CA 90010- |
| 14 | QUANTUMSHIFT COMMUNICATIONS, INC.
88 ROWLAND WAY, SUITE 145 | QUINTELCO, INC.
1 BLUE HILL PLAZA, P. O. BOX 1665 |
| 15 | NOVATO CA 94945- | PEARL RIVER NY 10965- |
| 16 | R.C.P. SERVICES
TWO CONWAY PARK 150 FIELD DRIVE, | R.L. COMMUNICATIONS, INC.
7355 N 8TH STREET |
| 17 | LAKE FOREST IL 60045- | PHOENIX AZ 85020- |
| 18 | RCN TELECOM SERVICES, INC.
105 CARNEGIE CENTER | REFLEX COMMUNICATIONS, INC.
1601 5TH AVE., STE. 710 |
| 19 | PRINCETON NJ 08540- | SEATTLE WA 98101- |
| 20 | REGAL TELEPHONE COMPANY
1119 WEST KENT SUITE J | RESORT OPERATOR SERVICES
62975 BOYD ACRES ROAD, STE. 2 |
| 21 | MISSOULA MT 59801- | BEND OR 97701- |
| 22 | RIO VIRGIN TELEPHONE &
P. O. BOX 189 | R-JEN, INC.
1551 S. 2ND AVE. |
| 23 | ESTACADA OR 97023- | TUCSON AZ 85713- |
| 24 | ROBERT & GINGER DEBENEDETTO
5756 BERNSTEIN DR. | ROCKY MOUNTAIN BROADBAND, INC.
999 18TH STREET, SUITE 2201, NORTH TOWER |
| 25 | BULLHEAD CITY AZ 86426- | DENVER CO 80202- |
| 26 | RSL COM U.S.A., INC. | RSM COMMUNICATIONS, LTD. |

1	ATTN: DAVID O'CONNOR WASHINGTON DC 20006-	2099 303 E. GURLEY ST. #450 PRESCOTT AZ 86301-
2		
3	SBC TELECOM INC. 300 CONVENT, ROOM 1994 SAN ANTONIO TX 78205-	SCS OF ARIZONA, INC. 110 STONY POINT ROAD, 2ND FLOOR SANTA ROSA CA 95401-
4		
5	SF TELECOM 148 W. ORION, SUITE C-3 TEMPE AZ 85283-	SHAMROCK COMMUNICATIONS, 5941 E. VERMILLION STREET MESA AZ 85215-
6		
7	SMARTSTOP, INC. 921 SW WASHINGTON STREET, SUITE 210 PORTLAND OR 97205-	SMART-TEL, INC. P. O. BOX 47025 PHOENIX AZ 85068-
8		
9	SMOKE SIGNAL COMMUNICATIONS 8700 SOUTH GESSNER HOUSTON TX 77074-	SNET AMERICA, INC. 310 ORANGE STREET, 3RD FLOOR NEW HAVEN CT 06510-
10		
11	SNIP LINK, LLC 100-A TWINBRIDGE DRIVE PENNSAUKEN NJ 08110-	SOUTH CENTRAL UTAH TELEPHONE P. O. BOX 555 ESCALANTE UT 84726-
12		
13	SOUTHSIDE LIQUORS 47 W. BROADWAY ROAD MESA AZ 85210-	SOUTHWESTERN BELL LONG 5850 W. LAS POSITAS BLVD. PLEASANTON CA 94588-
14		
15	SOUTHWESTERN TELEPHONE P.O. BOX 5158 MADISON WI 53705-	SPECIAL ACCOUNTS BILLING GRP, 1483 CHAIN BRIDGE ROAD, # 300 MCLEAN VA 22101-
16		
17	SPRINT COMMUNICATIONS COMPANY 6860 W. 115TH, MS:KSOPKD0105 OVERLAND PARK KS 66211-	SPRINT PAYPHONE SERVICES, INC. 6480 SPRINT PARKWAY KSOPHM0306-3B204 OVERLAND PARK KS 66251-
18		
19	STAPLES COMMUNICATIONS 2912 LAKESIDE DR. OKLAHOMA CITY OK 73120-	STAR/TFR BUSINESS P. O. BOX 25585 YUMA AZ 85367-
20		
21	STARLINK COMMUNICATIONS, L.L.C. 1000 MARINA BOULEVARD, SUITE 600 BRISBANE CA 94005-	STARTEC GLOBAL LICENSING 1151 SEVEN LOCKS ROAD POTOMAC MD 20854-
22		
23	STRESS LESS STEP 5115 N. SCOTTSDALE RD. SCOTTSDALE AZ 85251-	SUN VALLEY COMMUNICATIONS 9221 E. PALM TREE DRIVE TUCSON AZ 85710-
24		
25	SYUFY ENTERPRISES/CENTURY 150 PELICAN WAY SAN RAFAEL	TABLE TOP TELEPHONE COMPANY, INC. 600 N SECOND AVE. CA 94901- AJO AZ 85321-
26		

1	TALK AMERICA INC 6805 ROUTE 202 NEW HOPE PA 18938-	TCAST COMMUNICATIONS, INC. 24251 TOWN CENTER, 2ND FLOOR VALENCIA CA 91355-
2		
3	TCG PAYPHONES, INC. ATTN: GRETA BANKS % AT&T 795 FOLSOM SAN FRANCISCO CA 94107-	TCG PHOENIX 795 FOLSOM ST., ROOM 2160-E SAN FRANCISCO CA 94107-
4		
5	TEL ONE, INC. 1001 E. SOUTHMORE, SUITE 600 PASADENA TX 77502-	TEL WEST COMMUNICATIONS L.L.C. P. O. BOX 94447 SEATTLE WA 98124-
6		
7	TELALEASING ENTERPRISES, INC. 10120 WINDHORST RD. TAMPA FL 33619-	TELBRUCE COMMUNICATION 4320 N. CAPRI CIRCLE PRESCOTT VALLEYAZ 86314-
8		
9	TELCO PARTNERS, INC. PATRICK CROCKER KALAMAZOO MI 49007-	TELCORP, LTD 900 COMERICA 1250 BROADWAY HEWLETT NY 11557-
10		
11	TELECARE, INC. 444 LAFAYETTE ROAD NOBLESVILLE IN 46060-	TELECOM RESOURCES, INC. 15305 DALLAS PARKWAY, STE. 1500 ADDISON TX 75001-
12		
13	TELECOM*USA 201 SPEAR STREET, 9TH FLOOR SAN FRANCISCO CA 94105-	TELEGLOBE USA INC. 11495 COMMERCE PARK DRIVE RESTON VA 20191-
14		
15	TELEMANAGEMENT SYSTEMS, INC. 3000 S. JAMAICA COURT, SUITE 250 AURORA CO 80014-	TELEPHONE COMPANY OF CENTRAL 3599 LAKE MARY BLVD., SUITE E LAKE MARY FL 32746-
16		
17	TELE-PRO INDEPENDENT 3331 E. WALTANN LANE PHOENIX AZ 85032-	TELESPAN COMMUNICATIONS, INC. 5925 E.P. TRUE PKWY #7 WEST DES MOINES IA 50266-
18		
19	TELETRUST, INC. 5760-C 40TH STREET LUBBOCK TX 79407-	TELEUNO, INC 2754 N. ATLANTIC BLVD., SUITE 8 POMPANO BEACH FL 33069-
20		
21	TELIGENT SERVICES, INC. 460 HERNDON PARKWAY, SUITE 100 HERNDON VA 20170-	TELMEX USA, L.L.C. 944 FARNHAM STREET, STE. 200 SAN DIEGO CA 92123-
22		
23	THE FREE NETWORK, L.L.C. 1607 E. BIG BEAVER ROAD, STE. 201 TROY MI 48083-	THE PHONE CONNECTION 808 S BAKER STREET MT HOME AR 72653-
24		
25	TLX COMMUNICATIONS, INC. 913 SOUTH BURNSIDE AVENUE	TMC COMMUNICATIONS 125 E. DE LA GUERRA SUITE 201
26		

1	GONZALES LA 70737-	SANTA BARBARA CA 93101-
2	T-NETIX INTERNET SERVICES, INC. 1720 WINDWARD CONCOURSE, STE. 250	T-NETIX TELECOMMUNICATIONS 2155 CHENAULT DRIVE, STE. 410
3	ALPHARETTA GA 30005-	CARROLLTON TX 75006-
4	T-NETIX, INC. 1544 VALWOOD PARKWAY, SUITE 102	TON SERVICES INC. 4185 HARRISON BLVD.
5	CARROLLTON TX 75006-	OGDEN UT 84403-
6	TON SERVICES, INC. 4185 HARRISON BOULEVARD,	TOUCH 1 COMMUNICATIONS, INC. STE. 301 P. O. DRAWER 10751
7	OGDEN UT 84403-	ATMORE AL 36504-
8	TOUCH AMERICA 130 N. MAIN STREET	TRANSCOMMUNICATIONS, INC. 6125 PRESERVATION DRIVE
9	BUTTE MT 59701-	CHATTANOOGA TN 37416-
10	TRANSPORT COMMUNICATIONS 26565 W. AGOURA RD., STE. 305	TRATTORIA PINA 5541 N. SWAN RD.
11	CALABASAS CA 91302-	TUCSON AZ 85718-
12	TRESCOM U.S.A., INC. 1700 OLD MEADOW RD., 3RD FLOOR	TTI NATIONAL, INC. 201 SPEAR STREET, 9TH FLOOR
13	MCLEAN VA 22102-	SAN FRANCISCO CA 94105-
14	TYLER'S TASTE OF TEXAS, INC. 10800 EAST FRONTAGE RD.	U S LONG DISTANCE, INC. % DAVID LENARD 1670 BROADWAY
15	YUMA AZ 85365-	DENVER CO, 80202-
16	U.S. TELECOM LONG DISTANCE, INC. 3960 HOWARD HUGHES PARKWAY, FIFTH	UKI COMMUNICATIONS, INC. 2 NORTH TWENTIETH STREET, STE. 200
17	LAS VEGAS NV 89119-	BIRMINGHAM AL 85203-
18	UNITED COMMUNICATIONS HUB, INC. 225 SOUTH LAKE AVENUE, SUITE 705	UNITED STATES ADVANCED 3080 NORTHWOODS CIRCLE
19	PASADENA CA 91106-	NORCROSS GA 30071-
20	UNITED STATES 5251 110TH AVENUE NORTH, STE. 118	UNI-TEL COMMUNICATIONS GROUP, INC. 47 EAST CHICAGO AVENUE #328
21	CLEARWATER FL 33760-	NAPERVILLE IL 60540-
22	UNIVANCE TELECOMMUNICATIONS, INC 373 INVERNESS DRIVE SOUTH, STE. 100	UNIVERSAL ACCESS OF ARIZONA, INC. 233 S. WACKER DRIVE, SUITE 600
23	ENGLEWOOD CO 80112-	CHICAGO IL 60606-
24	UNIVERSAL TELECOM 10 105 E. VIA LINDA, BLDG. 103, STE. 244	URBAN TELECOMMUNICATIONS INC. 302 WALNUT AVE.
25	SCOTTSDALE AZ 85258-	BRONX NY 10454-
26		

1	US WATS, INC. 2 GREENWOOD SQUARE BENSALEM PA 19020-	VALLEY TELEPHONE COOPERATIVE 3331 STREET P. O. BOX 970 WILLCOX AZ 85644-
3	VALLEY WEST PAYPHONE, INC. 25 E. WATER TANK RD. GILBERT AZ 85296-	VALOR TELECOMMUNICATIONS CLEC 201 EAST JOHN CARPENTER FREEWAY, IRVING TX 75062-
5	VANION TELECOM, INC. 2 NORTH CASCADE, STE. 900 COLORADO SPRINGS CO 80903-	VARTEC TELECOM (R) / CLEAR CHOICE 1600 VICEROY DRIVE DALLAS TX 75235-
7	VERIZON AVENUE TWO CONWAY PARK, 150 FIELD DRIVE, LAKE FOREST IL 60045-	VERIZON CALIFORNIA 112 LAKEVIEW CANYON RD -CA501GC THOUSAND OAKS CA 91362-
10	VERIZON ENTERPRISE SOLUTIONS 1320 NORTH COURT HOUSE RD, 9 Fl ARLINGTON VA 22201-	VERIZON LONG DISTANCE 1320 N. COURT HOUSE RD. 9 th Fl. ARLINGTON VA 22201-
12	VERIZON SELECT SERVICES, INC. 6665 N. MACARTHUR BLVD., HQK02D84 IRVING TX 75039-	VISTA INTERNATIONAL 795 FOLSOM ST., ROOM 2160-E SAN FRANCISCO CA 94107-
14	VYVX, LLC ONE TECHNOLOGY CENTER, MAIL DROP: TC TULSA OK 74103-	W2COM INTERNATIONAL, LLC 3500 PARK CENTER DRIVE DAYTON OH 45414-
16	WEBNET COMMUNICATIONS, INC. 20904 WINOLA TERRACE ASHBURN VA 20147-	WESTERN AMERICAN P. O. BOX 488 CHANDLER AZ 85244-
18	WILDCAT WASH WELL, LTD. 902 E. SPEEDWAY TUCSON AZ 85719-	WILLCALL PAYPHONE SERVICES 165 REDROCK RD. SEDONA AZ 86351-
20	WINSTAR WIRELESS OF ARIZONA, INC. 1577 SPRING HILL RD., 2ND FLOOR VIENNA VA 22182-	WLNI, LLC. ONE TECHNOLOGY CENTER, MAIL Drop TULSA OK 74103-
22	WOD SYSTEMS, INC. 3705 E. GROVE MESA AZ 85206-	WORKING ASSETS LONG DISTANCE 101 MARKET STREET, STE. 700 SAN FRANCISCO CA 94105-
24	XO ARIZONA, INC. 3930 E. WATKINS, STE. 200 PHOENIX AZ 85034-	XO LONG DISTANCE SERVICES, INC. 3930 EAST WATKINS, STE. 200 PHOENIX AZ 85034-
26	YEN CHING RESTAURANT & LOUNGE 126 S. POWER ROAD	ZENEX LONG DISTANCE, INC. 201 ROBERT S. KERR, S 500

1 MESA AZ 85206-
2 ZEPHION NETWORKS
2950 GALLOWS ROAD
3 FALLS CHURCH VA 22042-

OKLAHOMA CITY OK 73102-
ZONE TELECOM, INC.
200 LAKE DRIVE EAST, STE. 200
CHERRY HILL NJ 08002-

4 Z-TEL COMMUNICATIONS, INC.
601 SOUTH HARBOUR ISLAND BLVD., STE
5 TAMPA FL 33602-

6 JON POSTON
ACTS
7 6733 EAST DALE LANE
CAVE CREEK, AZ 85331

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