

1 checklist items, change management, the performance assurance plan and all other matters except
2 the ROC OSS test which is not scheduled to be completed at that time before the three Colorado
3 Commissioners over the objection of WorldCom in a status conference held December 12, 2001.
4 WorldCom specifically advised Chairman Gifford that the dates he established for the Colorado
5 Hearing conflicted with the Arizona final OSS workshop scheduled in this proceeding for the
6 week of January 14-18, 2001.
7

8 WorldCom's in-house attorney, Thomas F. Dixon and witnesses Elizabeth Balvin and
9 Chad Warner, have actively participated in both the Arizona 271 proceedings and the Colorado
10 271 proceedings. Mr. Dixon has been the active attorney since their inception well over two years
11 ago. Ms. Balvin has been the primary witness on OSS matters and the change management
12 redesign process, both in Arizona and at the ROC, upon which the Colorado Commission will
13 rely. Mr. Warner has been the primary witness on the performance assurance plan and data
14 reconciliation for both proceedings. If the schedules allow, Mr. Dixon, Ms Balvin, and Mr.
15 Warner will participate in both the final OSS hearing in Arizona and the hearing in Colorado.
16 While it is theoretically possible to seek a back-up attorney to cover the hearings, WorldCom
17 cannot replace its technical witnesses who have the most factual knowledge about the OSS
18 testing, change management and data reconciliation.
19

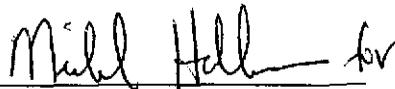
20 WorldCom agrees with Staff that given the overlap with other comments and briefs that
21 are due on the Checklist reports and other OSS workshops, parties will be unable to meaningfully
22 prepare for and participate in the final workshop without the additional time. WorldCom has been
23 diligently preparing questions and comments due under the current schedule and will meet that
24 schedule if Staff's motion is not granted. The various reports upon which parties are expected to
25
26

1 comment are over a thousand pages of material. In addition, parties must file closing comments
2 on the stand-alone test environment report issued by HP and data reconciliation issues on January
3 11, 2001.

4 WorldCom did not file a motion to delay the workshop because it agreed to the dates
5 established (before Colorado set its hearing on January 16-18, 2001) and did not want to be
6 perceived as renegeing on its agreements here. However, in view of what the Colorado Hearing
7 Commissioner has scheduled, WorldCom concurs in Staff's request and believes that a one week
8 delay will not truly delay when this Commission issues its recommendation on Qwest's 271
9 application given the amount of work that remains to be done by Staff and the parties on other
10 matters in addition to the OSS test and its related testing procedures.

11
12 RESPECTFULLY submitted this 31st day of December, 2001.

13
14 LEWIS AND ROCA LLP

15 

16 Thomas H. Campbell
17 40 N. Central Avenue
18 Phoenix, Arizona 85007
19 Telephone (602) 262-5723

20 - AND -

21 Thomas F. Dixon
22 WorldCom, Inc.
23 707 - 17th Street, #3900
24 Denver, Colorado 80202
25 Telephone: (303) 390-6206

26 Attorneys for WorldCom, Inc.

1 ORIGINAL and ten (10)
2 copies of the foregoing filed
3 this 31st day of December, 2001,
4 with:

5 Arizona Corporation Commission
6 Docket Control – Utilities Division
7 1200 W. Washington Street
8 Phoenix, Arizona 85007

9 COPY of the foregoing hand-
10 delivered this 31st day of December, 2001,
11 to:

12 Maureen Scott
13 Legal Division
14 Arizona Corporation Commission
15 1200 W. Washington Street
16 Phoenix, Arizona 85007

17 Jane Rodda, Administrative Law Judge
18 Arizona Corporation Commission
19 1200 W. Washington Street
20 Phoenix, Arizona 85007

21 Ernest Johnson, Director
22 Utilities Division
23 Arizona Corporation Commission
24 1200 W. Washington Street
25 Phoenix, Arizona 85007

26 COPY of the foregoing mailed
this 31st day of December, 2001, to:

Lyndon J. Godfrey
Vice President – Government Affairs
AT&T Communications of the
Mountain States
111 West Monroe, Suite 1201
Phoenix, Arizona 85003

Scott Wakefield
Residential Utility Consumer Office
2828 N. Central Avenue
Phoenix, Arizona 85004

LEWIS
AND
ROCA
LLP
LAWYERS

- 1 Mark Dioguardi
Tiffany and Bosco PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, Arizona 85004
- 4 Richard M. Rindler
Swidler & Berlin
3000 K. Street, N.W.
Suite 300
Washington, DC 20007
- 7 Maureen Arnold
US West Communications, Inc.
3033 N. Third Street
Room 1010
Phoenix, Arizona 85012
- 10 Jeffrey W. Crockett
Snell & Wilmer
One Arizona Center
Phoenix, Arizona 85004-0001
- 12 Richard P. Kolb
Vice President – Regulatory Affairs
OnePoint Communications
Two Conway Park
150 Field Drive, Suite 300
Lake Forest, Illinois 60045
- 16 Andrew O. Isar
TRI
4312 92nd Avenue N.W.
Gig Harbor, Washington 98335
- 18 Darren S. Weingard
Stephen H. Kukta
Sprint Communications Co., L.P.
1850 Gateway Drive, 7th Floor
San Mateo, CA 94404-2467
- 21 Timothy Berg
Fennemore, Craig, P.C.
3003 N. Central Avenue
Suite 2600
Phoenix, Arizona 85012-3913
- 24 Charles Steese
Qwest
1801 California Street, Ste. 5100
Denver, Colorado 80202

LEWIS
AND
ROCA
LLP
LAWYERS

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Joan S. Burke
Osborn & Maledon
2929 N. Central Avenue
21st Floor
Phoenix, Arizona 85067-6379

Richard S. Wolters
AT&T & TCG
1875 Lawrence Street
Suite 1575
Denver, Colorado 80202

Michael M. Grant
Todd C. Wiley
Gallagher & Kennedy
2575 E. Camelback Road
Phoenix, AZ 85016-4240

Raymond S. Heyman
Michael Patten
Roshka Heyman & DeWulf
Two Arizona Center
400 Fifth Street
Suite 1000
Phoenix, Arizona 85004

Diane Bacon, Legislative Director
Communications Workers of America
5818 North 7th Street
Suite 206
Phoenix, Arizona 85014-5811

Charles Kallenback
ACSI
131 National Business Parkway
Annapolis Junction, Maryland 20701

Bradley Carroll, Esq.
Cox Arizona Telcom, L.L.C.
1550 West Deer Valley Road
Phoenix, Arizona 85027

Joyce Hundley
United States Department of Justice Antitrust Division
1401 H Street, N.W.
Suite 8000
Washington, D.C. 20530

LEWIS
AND
ROCA
LLP
LAWYERS

- 1 Daniel Waggoner
Davis Wright Tremaine
- 2 2600 Century Square
15011 Fourth Avenue
- 3 Seattle, Washington 98101-1688

- 4 Alaine Miller
NextLink Communications, Inc.
- 5 500 108th Avenue NE, Suite 2200
Bellevue, Washington 98004

- 6 Mark N. Rogers
Excell Agent Services, LLC
- 7 2175 W. 14th Street
Tempe, Arizona 85281

- 9 Traci Grundon
Davis Wright Tremaine LLP
- 10 1300 S.W. Fifth Avenue
Portland, Oregon 97201

- 11 Mark P. Trincherro
Davis Wright Tremaine LLP
- 12 1300 S.W. Fifth Avenue, Suite 2300
Portland, Oregon 97201

- 14 Gena Doyscher
Global Crossing Local Services, Inc.
- 15 1221 Nicollet Mall
Minneapolis, Minnesota 55403-2420

- 16 Penny Bewick
New Edge Networks, Inc.
- 17 P.O. Box 5159
Vancouver, WA 98668

- 19 Jon Loehman
Managing Director-Regulatory
- 20 SBC Telecom, Inc.
5800 Northwest Parkway
- 21 Suite 135, Room I.S. 40
San Antonio, TX 78249

- 22 M. Andrew Andrade
5261 S. Quebec Street
- 23 Suite 150
Greenwood Village, CO 80111

- 25
- 26

LEWIS
AND
ROCA
LLP
LAWYERS

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

Douglas Hsiao
Rhythms Links Inc.
9100 E. Mineral Circle
Englewood, CO 80112

Karen Clauson
Eschelon Telecom, Inc.
730 2nd Avenue South
Suite 1200
Minneapolis MN 55402

Brian Thomas
Vice President Regulatory – West
Time Warner Telecom, Inc.
520 S.W. 6th Avenue
Suite 300
Portland, Oregon 97204

Andrea P. Harris
Senior Manager, Regulatory
Allegiance Telecom, Inc. of Arizona
2101 Webster, Suite 1580
Oakland, CA 94612

Jaime Williams