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BEFORE THE ARIZONA CORPORATION COMMISSION

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Chairman
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Commissioner

Arizona Corporation Commission

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AZ CORP COMMISSION
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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

AT&T'S COMMENTS ON QWEST'S
SGAT, NINTH REVISION

AT&T Communications of the Mountain States, Inc. and TCG Phoenix,
(collectively, "AT&T") hereby respond to Qwest Corporation, Inc.'s ("Qwest")
Statement of Generally Available Terms and Conditions, Ninth Revision, dated
November 30, 2001.

On November 20, 2001, the Arizona Corporation Commission ("Commission")
issued its Decision Numbers 64214, 64215 and 64216 regarding Qwest's compliance
with checklist item 6 (unbundled switching), emerging services (line sharing, subloops,
dark fiber and packet switching), and checklist item 5 (unbundled dedicated transport),
respectively. Pursuant to two of the decisions, Qwest had 7 days from the effective date
of the decisions to file revised SGAT language incorporating the findings and
conclusions contained in the decisions. The third decision provided 10 days. Qwest
requested and was granted leave to file all conforming SGAT language on November 30,
2001. Interested parties had 10 days to file comments on Qwest's SGAT revisions.

AT&T has not had the opportunity to review the SGAT thoroughly. In an attempt to complete this proceeding under the terms of the Procedural Schedule dated November 2, 2001, Staff scheduled numerous other comments for the same period.

On November 30, 2001, Hewlett Packard issued its preliminary SATE Summary Evaluation Report. On November 30, 2001, Cap Gemini Ernst & Young released its data reconciliation report. On November 30, 2001, Qwest issued its second report on the change management process. Liberty Consulting released its data reconciliation report on December 3, 2001. Comments on all four of those reports are due no later than December 10, 2001. Finally, the briefs on the Functionality Test workshop are due December 11, 2001.

At some point, it is unrealistic to presume that parties will have enough resources to adequately review and comment on every report issued and every SGAT revision. AT&T has reached that point. It simply could not file comments on four reports, file a brief on the Functionality Test workshop and adequately review the SGAT for compliance with the Commission decisions in the time allotted.

Over 100 sections of the SGAT were identified by Qwest as having changes, either in response to the Commission decisions or agreement to comply with Staff's Reports.¹ Furthermore, many of the changes are not redlined.

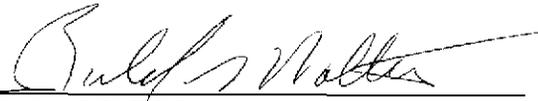
The Commission and Staff cannot expect the parties to provide meaningful comments under these circumstances. AT&T's ability to meaningfully participate has been prejudiced by the requirement to file multiple comments in such a short period of time. Accordingly, AT&T reserves the right to review the SGAT on a continuing basis

¹ See footnote 3 to Qwest Corporation's Notice of Updated Statement of Generally Available Terms and Conditions dated November 30, 2001.

and raise objections to SGAT language or the failure to incorporate changes agreed to, required by this Commission, or contained in consensus language from other jurisdictions, in this and future proceedings, either before the Federal Communications Commission or the courts.

Respectfully submitted this 10th day of December, 2001.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.
AND TCG PHOENIX**

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CERTIFICATE OF SERVICE

I certify that the original and 10 copies of AT&T's Comments on Qwest's SGAT, Ninth Revision in Docket No. T-00000A-97-0238 were sent by overnight delivery on December 10, 2001 to:

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