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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

JEFF HATCH-MILLER - CHAIRMAN
WILLIAM A. MUNDELL
MARC SPITZER
MIKE GLEASON
KRISTIN K. MAYES

IN THE MATTER OF THE FORMAL
COMPLAINT OF ACCIPITER
COMMUNICATIONS, INC., AGAINST
VISTANCIA COMMUNICATIONS, L.L.C.,
SHEA SUNBELT PLEASANT POINT, L.L.C.,
AND COX ARIZONA TELCOM, LLC.

DOCKET NO. T-03471A-05-0064

NOTICE OF FILING

Pursuant to the February 13, 2006 Procedural Order, Cox Arizona Telcom, LLC ("Cox") hereby files its responses to Staff's 9th set of data requests in this docket.

RESPECTFULLY SUBMITTED this 22nd day of March 2006.

COX ARIZONA TELCOM, LLC.

By 
Michael W. Patten
One Arizona Center
400 East Van Buren Street, Suite 800
Phoenix, Arizona 85004

Original and 13 copies of the foregoing filed this 22nd day of March 2006 with:

Docket Control
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

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1 Copy of the foregoing hand-delivered/mailed
2 this 22nd day of March 2006 to:

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8 Phoenix, Arizona 85007

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March 22, 2006

HAND-DELIVERED

Maureen A. Scott, Esq.
Legal Division
Arizona Corporation Commission
1200 West Washington
Phoenix, Arizona 85007

*Re: Cox Arizona Telcom, LLCs Response to Staff's Ninth Set of
Data Requests – Docket No. T-03471A-05-0064*

Dear Maureen:

Enclosed please find the initial response of Cox Arizona Telcom, L.L.C. to Staff's 9th set of data requests in this docket.

Please contact me if you have any questions.

Sincerely,



Michael W. Patten

MWP/mi
Enclosures

cc: Constance Fitzsimmons, Legal Division
Armando Fimbres, Utilities Division

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
Docket No. T-03481A-05-0064
March 22, 2006**

STF 9.1 Cox's response to STF 4.6 states in part – "The handwritten notes in question are those of Tisha Arthurs and are a recital of statements made by the developer to Cox at a meeting that occurred on February 13, 2003. By that time, the developer and Cox had already negotiated a preferred provider agreement whereby CoxCom, Inc. and Cox Arizona Telcom would incur the substantial capital costs to build the communications and telecommunications infrastructure at the entire Vistancia Development." Please confirm (1) the date by which Cox negotiated the preferred provider agreement referenced above and (2) the date by which Cox signed the preferred provider agreement referenced above.

RESPONSE: Cox objects to this request in that it is burdensome and already answered. Staff has copies of all signed agreements and documentation that pertains to when discussions surrounding the preferred provider agreement took place prior to its actual signing.

Notwithstanding this objection and without waiving it, Cox states as follows: During the Fall of 2002, Cox negotiated residential and commercial preferred provider agreements with the developer. Under the terms of those two agreements, the developer agreed to make a \$2 million capital contribution and to provide preferred marketing of Cox's services in Vistancia. In exchange, Cox would build the infrastructure necessary to bring services out to Vistancia, would provide services to both residential and commercial customers, and would give the developer revenue sharing based on penetration rates. These agreements were essentially completed by late December of 2002. In late December of 2002, the developer informed Cox that it wished to redraft the agreements to provide for a multi-use easement ("MUE") arrangement which the developer stated was legally being used in other states. The developer assured Cox that the deal negotiated by the parties would effectively remain the same. The developer drafted revised agreements, which eventually became the Co-Marketing Agreement and the Property Access Agreement of April 2003.

RESPONDENT: Tisha Arthurs Christle
Cox Communications Phoenix

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
Docket No. T-03481A-05-0064
March 22, 2006**

STF 9.2

This expands on or clarifies STF 5.2. Regarding Cox's data response on page CO1853 – "Paul and I met with Sunbelt Holdings today and they are giving us some pretty creative ways to keep the competition out." – please provide copies, or the best representations possible, of all the creative ideas that Cox's response on page CO1853 states were given to Cox.

RESPONSE:

Cox objects to this request on the grounds that it has been asked and answered in previous data requests. Staff has copies of all documentation from Cox related to the Accipiter complaint filing.

Notwithstanding this objection and without waiving it, Cox states as follows: The developer explained that it would seek and obtain an MUE from the City of Peoria to give it the legal right to control access to the Vistancia community. The Cox employees who attended the meeting were not familiar with this arrangement, but they were assured by the developer that the MUE arrangement was being legally used in other parts of the country. As reflected in the handwritten notes of Tisha Christle documenting the meeting on February 13, 2003, the developer stated that it would give Cox a capital contribution of \$5 million and demanded access fees in the amount of \$3 million. (C01769) The developers did not provide any written documentation to Cox at the February 13 meeting. As reflected in the handwritten notes of Tisha Christle dated February 18, 2003, Ms. Christle was unclear about what the developer was proposing because the arrangement seemed to her to provide Cox with "an interest free loan." (C01769) The developers subsequently provided drafts of the commercial and residential agreements that provided for a \$3 million capital contribution from the developer to Cox and marketing compensation from Cox to the developer in the amount of \$1 million plus revenue sharing.

RESPONDENT:

Tisha Arthurs Christle
Cox Communications Phoenix

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
Docket No. T-03481A-05-0064
March 22, 2006**

STF 9.3

Cox's response to STF 5.2 states in part that Cox representatives "just listened to the developer's position and assertions." Please explain (1) if Cox representatives ever make any comments to Sunbelt Holdings representatives to express Cox's reservations about the potential anti-competitive nature of the developer's position and assertions and (2) provide all documents, notes and emails available to support Cox's response.

RESPONSE:

Cox has already provided documents regarding these matters. None of the current Cox employees recall that any "reservations about the potential anti-competitive nature of the developer's position and assertions" were stated to the developer. There was no need for such statements because the developer repeatedly assured Cox that the MUE arrangement was legally being used in other parts of the country and that the MUE had to be obtained from the City of Peoria.

RESPONDENT:

Tisha Christle, Cox Communications Phoenix
Cox Legal

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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March 22, 2006**

STF 9.4 Regarding Cox's response to STF 5.2 which states in part – "Because Cox had no prior familiarity with private easements and because Cox was assured by the developer that, if granted by the City of Peoria, such a private easement was perfectly legal and gave the developer the right to control access to its property, Cox did not question what the developer was doing" – please (1) provide the name and title of the lead Cox representative who had the final authority to seek the advice of Cox attorneys in the above matter and (2) if Cox attorneys were ever consulted on the legal issues portrayed in the statement above.

RESPONSE: Tisha Christle, Senior Account Executive of New Business Development, was the Cox representative who served as liaison with Cox legal counsel during the Spring of 2003 to review the new agreements that had been drafted by the developer. Linda Trickey, whose title at the time was Corporate Counsel, assisted in providing legal review of the drafts. Cox cannot disclose the contents of the communications between Ms. Christle and Ms. Trickey without waiving the attorney-client privilege, and it is Cox's policy not to waive the attorney-client privilege. Both Ms. Christle and Ms. Trickey will provide testimony at the upcoming hearing to explain more fully their non-privileged communications with the developer about the draft agreements.

RESPONDENT: Cox Legal

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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STF 9.5

Please provide the associated business titles and explain the respective business roles, during the period covered by the Accipiter 05-0064 matter, of the eight Cox employees referenced in Cox's responses to STF 5.5 and 5.6.

RESPONSE:

Tisha Arthurs Christle - Senior Account Executive, whose business role in New Business Development is to sign up developers to bring Cox services to their respective developments.

Franklin Vincent - Director, FP&A, whose business role was to direct the Financial Planning and Analysis section in the Business Operations of Cox Communications.

Dan Sjostrom - Senior Financial Analyst, whose business role was to perform various financial analyses on business opportunities for Cox Communications.

Paul Drake - Director, New Business Development, whose business role was to direct the account executives and oversee the New Business Development group.

Sheila Crosby - Vice President of Sales, whose business role is to oversee the entire Sales function of all sales representatives for Cox Arizona.

Mary Kelly - Commercial Access Account Manager, whose role was to sign up commercial accounts related to new developments.

Jeff Walker - Sales Manager, Commercial Business Services, whose business role was to manage new commercial account businesses associated with new developments.

Linda Trickey - Corporate Counsel with Legal and Regulatory, whose role is to provide legal advice related to business associated with Cox Communications.

RESPONDENT:

Mark DiNunzio
Director, Regulatory Affairs

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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March 22, 2006**

STF 9.6

Please explain if the eight Cox employees referenced in Cox's responses to STF 5.5 and 5.6 are (1) still employed by Cox and, if so, (2) in which Cox organization and (3) in what capacity.

RESPONSE:

The employees referenced to Staff data request AFF 5.6 named eight Cox employees. That list with the above requested information is as follows:

Tisha Arthurs Christle - still employed by Cox Communications in Arizona as an Account Representative in New Business Development Direct and Retail Sales

Franklin Vincent – still employed by Cox Communications but now in New Orleans as Vice President of Finance

Dan Sjostrom – no longer employed by Cox Communications

Paul Drake - no longer employed by Cox Communications

Sheila Crosby – still employed by Cox Communications in Arizona as Vice President of Sales

Mary Kelly - no longer employed by Cox Communications

Jeff Walker - no longer employed by Cox Communications

Linda Trickey – still employed by Cox Communications in Atlanta as Senior Counsel with Legal and Regulatory

RESPONDENT:

Mark DiNunzio
Director, Regulatory Affairs

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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STF 9.7

Staff's analysis of Cox responses CO0001 to C3355, indicates that 56 Cox employees, listed below, were involved in some form of discussions, negotiations and/or various analyses leading to the eventual agreements defining Cox's participation in Vistancia. Please explain the involvement of those noted below in light of Cox's responses to STF 5.5 and 5.6.

	First Name	Last Name	Location			First Name	Last Name	Location
1	Tisha	Arthurs	Phoenix		29	Yvonne	Hitchcock-Dozer	Phoenix
2	Delynn	Ball	Phoenix		30	Heather	Housen	Atlanta
3	Meredith	Barnes	Phoenix		31	Nichele	Johnson	Phoenix
4	Donald	Belina	Phoenix		32	Denise	Johnson-Davis	Atlanta
5	Shannon	Boule	Phoenix		33	Mary	Kelley	Phoenix
6	Janson	Burgess	Phoenix		34	Percy	Kirk	Phoenix
7	Robert	Carter	Phoenix		35	Rob	Mayer	Phoenix
8	Don	Civalier	Phoenix		36	Natasha	Mays	Atlanta
9	Tisha	Christle	Phoenix		37	Bryan	McIntyre	Phoenix
10	Sheila	Crosby	Phoenix		38	Dan	Myers	Phoenix
11	Monica	Dahmen	Atlanta		39	Julia	North	Phoenix
12	Cindi	Deschane	Phoenix		40	Jerry	Nowicki	Phoenix
13	Mark	DiNunzio	Phoenix		41	Kamaree	Odom	Atlanta
14	Paul	Drake	Phoenix		42	Andrea	Olson	Phoenix
15	Patrick	Dryer	Phoenix		43	Dick	Purser	Atlanta
16	Don	Durland	Phoenix		44	J. Steve	Rizley	Phoenix
17	Aimee	Eiselstein	Phoenix		45	Bill	Salk	Phoenix
18	Douglas	Garrett	Emeryville		46	Dale	Scott	Phoenix
19	Jennifer	Gilbert	Phoenix		47	Dan	Sjostrom	Phoenix
20	Sandar	Gore	Atlanta		48	Nolan	Straabe	Phoenix
21	Kenneth	Gosney	Phoenix		49	Frank	Thornton	Phoenix
22	Jim	Grieco	Phoenix		50	Howard	Tigerman	Phoenix
23	Don	Guthrie	Phoenix		51	Linda	Trickey	Atlanta
24	LeAnn	Hanko	Phoenix		52	Mike	Tucker	Phoenix
25	Paezle	Harris	Atlanta		53	Marvel	Figil	Emeryville
26	Yvonne	Hayes	Atlanta		54	Franklin	Vincent	Phoenix
27	Kenny	Hensman	Phoenix		55	Laurie	Waddle	Phoenix
28	Jennifer	Hightowner	Atlanta		56	Jeffrey	Walker	Phoenix

RESPONSE:

Cox objects to this request in that it is burdensome and overreaching. Notwithstanding such objection and without waiving it, Cox notes that many of the names listed above are construction, engineering and plant employees who never had any discussions related to any agreements defining Cox's participation in Vistancia. Responses to Staff's requests STF 5.5, STF 5.6, STF 9.5 and STF 9.6 all pertain to the key personnel who had discussions related to any agreements defining Cox's participation in Vistancia. Set forth below are the current employment positions/status for the individuals identified above:

**Cox Arizona Telcom, LLC's
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First Name	Last Name	Location	Title
Tisha	Arthurs	Phoenix	Senior Account Executive
Delynn	Ball	Phoenix	Team Leader Dispatch
Meredith	Barnes	Phoenix	No longer with Cox
Donald	Belina	Phoenix	Manager- Engineering Support
Shannon	Boyle	Phoenix	Manager – New Business Development MDUs
Janson	Burgess	Phoenix	Team Manager RF Design
Robert	Carter	Phoenix	No longer with Cox
Don	Civalier	Phoenix	MTC Engineer
Tisha	Christle	Phoenix	Same as Tisha Arthurs (married name)
Sheila	Crosby	Phoenix	VP Sales
Monica	Dahmen	Atlanta	LNP Manager
Cindi	Deschane	Phoenix	Team Manager – Test desk
Mark	DiNunzio	Phoenix	Director, Regulatory Affairs
Paul	Drake	Phoenix	No longer with Cox
Patrick	Dryer	Phoenix	Manager New Business Development
Don	Durland	Phoenix	Network Ops Tech I
Aimee	Eiselstein	Phoenix	Temp
Douglas	Garrett	Emeryville	VP, Regulatory Affairs
Jennifer	Gilbert	Phoenix	Account Support Manager
Sandar	Gore	Atlanta	Code Administrator
Kenneth	Gosney	Phoenix	Project Coordinator I
Jim	Grieco	Phoenix	No longer with Cox
Don	Guthrie	Phoenix	Field Estimator
LeAnn	Hanko	Phoenix	Department Coordinator
Paezle	Harris	Atlanta	Senior Paralegal
Yvonne	Hayes	Atlanta	Senior Paralegal
Kenny	Hensman	Phoenix	Field Estimator
Jennifer	Hightowner	Atlanta	Assistant General Counsel
Yvonne	Hitchcock-Dozer	Phoenix	Account Executive
Heather	Housen	Atlanta	Senior Paralegal
Nichele	Johnson	Phoenix	Marketing Specialist III
Denise	Johnson-Davis	Atlanta	Subpoena Coordinator
Mary	Kelley	Phoenix	No longer with Cox
Percy	Kirk	Phoenix	General Manager Omaha System
Rob	Mayer	Phoenix	Team Leader – Commercial Field Engineer
Natasha	Mays	Atlanta	Code Administrator
Bryan	McIntyre	Phoenix	Manager – Field Engineering
Dan	Myers	Phoenix	Director Engineering Project Management & Design
Julia	North	Phoenix	No longer with Cox
Jerry	Nowicki	Phoenix	Director Construction Services
Kamaree	Odom	Atlanta	Number/Code Administrator
Andrea	Olson	Phoenix	SOC Specialist III
Dick	Purser	Atlanta	Director – Transport and Interconnection
J. Steve	Rizley	Phoenix	GM and Region Manger – Cox Arizona
Bill	Salk	Phoenix	Director MTC Engineering and Ops
Dale	Scott	Phoenix	Data Analyst - TMC
Dan	Sjostrom	Phoenix	No longer with Cox
Nolan	Straabe	Phoenix	No longer with Cox
Frank	Thornton	Phoenix	No longer with Cox
Howard	Tigerman	Phoenix	VP, Business Operations
Linda	Trickey	Atlanta	Senior Counsel
Mike	Tucker	Phoenix	No longer with Cox

**Cox Arizona Telcom, LLC's
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Marvel	Vigil	Emeryville	VP, Exchange Carrier
Franklin	Vincent	Phoenix	VP Finance – New Orleans system
Laurie	Waddle	Phoenix	Team Leader Test Desk
Jeffrey	Walker	Phoenix	No longer with Cox

RESPONDENT: Mark DiNunzio
Director, Regulatory Affairs

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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March 22, 2006**

STF 9.8

Cox's response to STF 6.3 states in part – "in late 2002 (after the essential terms of the agreements between Cox and the developer had been negotiated as stated above), the developer announced that it intended to obtain from the City of Peoria a private easement (rather than a public easement), and the developer explained that it would use its private easement rights to control which communications service providers would get access to the property." Please explain (1) exactly which agreements Cox is intending to reference in the statement above and (2) provide the corresponding dates on which those agreements were signed.

RESPONSE:

Cox objects to this question in that it requests information that Staff has already been provided. See response to STF 9.1 above.

RESPONDENT:

Cox Legal

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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STF 9.9

Cox's response to STF 6.3 states in part – "Cox believed at the time that the developer, for business reasons, wished to limit the number of telecommunications service providers at Vistancia, but Cox never believed that the developer would do so." Please explain in detail (1) the business reasons referenced in the statement above and (2) why Cox "never believed the developer would do so."

RESPONSE:

The developer explained to Cox only that it wanted to be able to recoup its capital contribution and that it wanted to use the MUE arrangement, which had been legally used elsewhere, to sell access rights to Vistancia. The agreements that the developer drafted provided only for non-exclusive access rights by Cox. Indeed, the agreements expressly provide as follows: "Specifically, it is understood by Cox that ... the Non-Exclusive License is non-exclusive and the Platted Easement Area may be utilized by other, even competitive, Common Service Providers ..." (*See, e.g., Co-Marketing Agreement effective April 8, 2003, at ¶ 3(b)(v).*) Moreover, even with the MUE, the developer would not have been able to exclude competition, because, for example, wireless sources or VoIP providers such as Vonage do not require access to easements.

RESPONDENT:

Tisha Christle, Cox Communications Phoenix
Cox Legal

**Cox Arizona Telecom, LLC's
Responses To Staff's 9th Set Of Data Requests
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STF 9.10

Cox's response to STF 6.3 states in part "When the developer obtained its private easement from the City of Peoria in the summer of 2003 (something that Cox had nothing to do with), the developer indicated that the agreements between Cox and the developer would need to be changed to reflect that Cox was being given access to the private easement held by the developer." Please confirm the exact date of the private easement agreement referenced above.

RESPONSE:

Cox objects to this request in that it has been asked and answered. Staff has all signed agreements related to all agreements pertaining to the Vistancia development. Notwithstanding this objection and without waiving it, Cox states that the Multi-Use Easements and Indemnity obtained by the developer from the City of Peoria purports to be dated effective July 2, 2003. See Exhibit E to the Complaint in this docket.

RESPONDENT:

Mark DiNunzio Director, Regulatory Affairs
Cox Legal

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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STF 9.11

Referring the question above, if Cox had already negotiated agreements in late 2002, as stated in Cox's response STF 6.3, (1) why did Cox agree to revise those agreements in the summer of 2003 and (2) did Cox receive any benefit, financial or otherwise, for revising agreements which, by its statements in responding to STF 6.3, Cox appears to believe were already binding.

RESPONSE:

As stated in response to STF 9.1 above, Cox and the developer had reached an understanding on the basic terms for the agreements and had effectively completed drafts by the end of 2002. However, although the parties had agreed in principle on the terms, they had not executed those agreements and there were no legally binding contracts that Cox could enforce. In late December 2002, before the agreements were signed, the developer stated that it wanted to restructure the documents to allow for an MUE that the developer would obtain from the City of Peoria. Cox did not object to the developer redrafting the documents so long as the terms that were critical to Cox remained the same. The developer assured Cox that the new drafts would not substantively alter the deal struck between the parties. Cox did not object to the developer's use of the MUE arrangement that it understood was legally being used in other parts of the country and that would require approval of the City of Peoria. The arrangements between the developer and the City of Peoria were the developer's business.

RESPONDENT:

Tisha Christle, Cox Communications Phoenix
Cox Legal

**Cox Arizona Telcom, LLC's
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STF 9.12

Cox's response to STF 6.7 states in part – "...although Cox questioned why a private easement had been or would be granted by the City, Cox did not resist the request by the developer to amend the agreements that Cox had already entered into with the developer before the developer obtained the private easement to reflect that Cox was being given access to the developer's private easement." Please provide (1) any supporting documents, notes, and/or emails which support that Cox questioned the private easement referenced above, (2) any information that supports efforts by Cox to obtain legal advice on the private easement referenced above, and (3) the dates associated with any actions on the part of Cox associated with the private easement referenced above.

RESPONSE:

Cox objects to this request in that Staff has all non-privileged notes, documents and agreements related to request. See response to STF 9.4 above. Cox was not involved in efforts by the developer to obtain the MUE from the City of Peoria.

RESPONDENT:

Tisha Christle, Cox Communications Phoenix
Cox Legal

**Cox Arizona Telcom, LLC's
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March 22, 2006**

STF 9.13 Keeping in mind Cox's response to STF 6.9, please explain in detail (1) how Cox came to understand of Qwest's concern regarding the Vistancia private easement and (2) the date when Cox reached such an understanding, (3) which individuals were involved in conveying information regarding such an understanding, and (4) why Cox's understanding of Qwest's concern did not lead to clarifying discussions with the developer, the City of Peoria and/or Qwest.

RESPONSE: Curt Smith, the developer's representative, contacted Mark DiNunzio sometime after the developer obtained the MUE from the City of Peoria. The exact date is unknown.

RESPONDENT: Mark DiNunzio, Director, Regulatory Affairs

**Cox Arizona Telcom, LLC's
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STF 9.14

Cox's response to STF 6.12 states – "This statement by Mr. DiNunzio is simply an indication on his part that he thought private easement arrangements might become more common in Arizona now that the City of Peoria had approved such an arrangement for the Vistancia developers." Please explain the reasons behind Mr. DiNunzio believing that private easement arrangements might become more common in Arizona.

RESPONSE:

The private easement concept was a new concept with which Mr. DiNunzio was unfamiliar at the time the City of Peoria approved the arrangement for the Vistancia developers. Knowing that the City approved such an arrangement, Mr. DiNunzio believed that other cities may start to approve such arrangements with developers in the future and that the Cox business personnel may experience some impact on the manner in which way future business would be conducted with developers based on these new city-approved arrangements.

RESPONDENT:

Mark DiNunzio
Director, Regulatory Affairs

**Cox Arizona Telcom, LLC's
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STF 9.15

Cox's response to STF 6.13 states in part – "the penetration by Cox at the approximately 1,450 houses constructed to date at Vistancia is only 49% for Internet, 52% for cable, and 60% for phone." Of the houses referenced above, please explain (1) how many houses had fully installed Cox telecommunications service, (2) how many houses had partially installed Cox telecommunications service, (3) how many homes had pending orders for Cox telecommunications service, and (4) how many houses were constructed but not occupied or sold.

RESPONSE:

Cox objects to this request on the grounds that it is vague and ambiguous and is redundant because it has been asked and answered in other data requests. For example, Cox does not know what is meant by "partially installed Cox telecommunications service"? Cox also states that a part of this request has already been answered in previous data responses to Staff (STF 7.3 and STF 7.6). Furthermore, subpart (4) above has been asked and Cox responded that it requests information that Cox does not possess.

RESPONDENT:

Mark DiNunzio
Director, Regulatory Affairs

**Cox Arizona Telcom, LLC's
Responses To Staff's 9th Set Of Data Requests
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March 22, 2006**

STF 9.16 Regarding Cox's response to STF 6.17, please (1) provide names and contacts for the developer(s) associated with the Master Planned Developments included in Cox's response to STF 6.17 which Cox serves with telecommunications and (2) explain which, if any, of the Master Planned Developments included in Cox's response to STF 6.17 are associated with Shea Sunbelt or its affiliates.

RESPONSE: See attached to Response to STF 8.2.

Springfield Lakes
Surprise Farms
Vistancia
Sun City Grand
Cortebella

Vistancia is associated with Shea Sunbelt. Surprise Farms is associated with Sunbelt Holdings.

RESPONDENT: Mark DiNunzio
Director, Regulatory Affairs