

**South Central  
COMMUNICATIONS**

P.O. BOX 555 ESCALANTE, UTAH 84726 (435) 826-7411

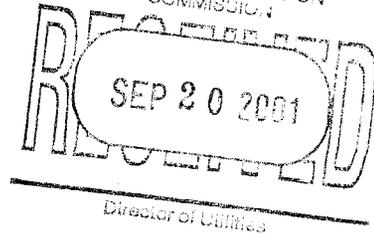
RECEIVED

2001 SEP 20 P 4: 28

AZ CORP COMMISSION  
DOCUMENT CONTROL



ARIZONA CORPORATION  
COMMISSION



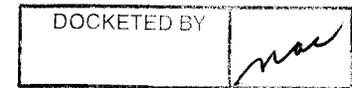
September 17, 2001

Arizona Corporation Commission  
1200 West Washington  
Phoenix, AZ 85007

Arizona Corporation Commission  
**DOCKETED**

SEP 20 2001

RE: T-01051B-01-0391 - Qwest CCSAC Access Service Tariff



Dear Sirs:

As a carrier operating in the State of Utah and serving parts of Northern Arizona, South Central Utah Telephone Association, Inc. respectfully requests the Commission to investigate application of Qwest's Access Service Tariff ("Access Tariff") revisions which imposed new usage-based Signaling System No. 7 ("SS7") message charges. Prior to the Commission's adoption of Qwest's tariff revisions, Qwest's SS7 message costs were recovered as part of its switched access service rates. For the reasons stated below, we believe that Qwest is incorrectly charging under the Access Tariff for SS7 messages that support local voice or/data messages.

To allow our Company to take advantage of operational efficiencies, we use the services of Illuminet to provide our SS7 messaging services. Illuminet then connects to other SS7 networks, including that operated by Qwest, and by contract passes through all Qwest SS7 message charges to us. To the extent that Qwest may attempt to assess improper charges under the proposed tariff to our SS7 provider ( and, therefore, to us), the interests of our Company are real and the economic effects on our Company may very well be significant.

We are not opposed to the concept of unbundling. The Company is opposed, however, to any unbundling such as that proposed by Qwest that attempt to assess charges to our SS7 provider under the Access Tariff for SS7 messages that support our local/data end user traffic.

Conceptually, Qwest's efforts to assess under an intrastate access tariff SS7 messages that are associated with intrastate end user toll services appear appropriate, since such charges are an integral component of end user toll (voice and data) traffic. However, the Commission should not permit Qwest to utilize an intrastate access tariff to assess for SS7 messages that support end user traffic that is local in nature. Rather, charges for SS7 messages associated with jurisdictionally local traffic (which compromises a significant portion of our traffic) can and should be determined pursuant to the terms of a negotiated or arbitrated interconnection agreement ("ICA"). Whether our Company directly connects to Qwest or employs the use of a third party SS7 provider does not and should not change the conclusion that it is the jurisdiction of the end user traffic that determines whether a tariff or ICA applies with respect to how SS message chargers, if any, should be assessed

Arizona Corporation Commission  
September 17, 2001  
01051B-01-0391 - Qwest Access Service Tariff  
Page 2

Accordingly, our Company believes the Commission should investigate application of the access tariff. Absent some relief from the Commission, our Company may be faced with inappropriate charges from Qwest that simply add to our cost of doing business to the detriment of the development of a more competitive marketplace.

Our Company therefore respectfully requests the Commission to take whatever steps are necessary to insure that Qwest can only bill our Company for services under an intrastate switched access tariff for the category of services appropriately billed under such a tariff. Messages associated with underlying local end user voice or data calls or not, however, within this category.

Sincerely,

A handwritten signature in cursive script, appearing to read "Daniel J. Spencer".

Daniel J. Spencer  
General Manager

DJS/gp