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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission
DOCKETED

OCT 11 2000

CARL J. KUNASEK
Chairman

JIM IRVIN
Commissioner

WILLIAM A. MUNDELL
Commissioner

DOCKETED BY [Signature]

IN THE MATTER OF THE APPLICATION AND) DOCKET NO. T-03887A-00-0386
PETITION OF ALLTEL COMMUNICATIONS,)
INC. FOR A CERTIFICATE OF CONVENIENCE)
AND NECESSITY TO PROVIDE COMPETITIVE) **MOTION TO CONTINUE**
INTRASTATE TOLL TELECOMMUNICATIONS) **DEADLINES AND HEARING**
SERVICES AS A RESELLER)
)
)
)

ALLTEL Communications, Inc. ("ACI"), by and through undersigned counsel, hereby moves to continue for a period of 120 days all deadlines in this matter and the hearing on its application for a certificate of convenience and necessity to provide competitive intrastate toll telecommunications services (the "Application").

Under the Procedural Order issued on September 11, 2000, the deadline for filing fair value rate base ("FVRB") information is presently fixed as October 10, 2000, and the deadline for filing exceptions to the Staff Report or requesting a hearing is presently fixed as November 11, 2000.

The reason for ACI's request is two-fold. First, due to the Court of Appeals' recent decision in *US West Communications, Inc. v. Arizona Corporation Commission*, there is a great deal of uncertainty concerning what information will be required of long-distance resellers to justify their rates. The Commission recently opened a generic docket to address how it should proceed in light of that case, and ACI will be participating in the generic docket. ACI wishes to briefly delay its Application to give these issues some time to be resolved.

Second, complying with the Procedural Order will require substantial additional time.

ROSHKA HEYMAN & DEWULF, PLC

TWO ARIZONA CENTER
400 NORTH 5TH STREET - SUITE 1000
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

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ACI is not accustomed to providing the type of information required by the Procedural Order to justify competitive rates. Rate justification for rate-regulated utilities typically takes several months to prepare. Although it is still unclear how extensive the rate analysis for resellers will be, ACI will need additional time to gather the necessary information and prepare the necessary analyses apparently required to justify its rates.

For the foregoing reasons, ACI requests that all deadlines set forth in the Procedural Order, and the date for the Hearing, be continued for a period of 120 days. By virtue of this request, ACI waives the time requirements in A.A.C. R14-2-1103.

RESPECTFULLY SUBMITTED this 17th day of October, 2000.

ROSHKA HEYMAN & DEWULF, PLC

By: 

Randall H. Warner
Two Arizona Center
400 North 5th Street, Suite 1000
Phoenix, Arizona 85004

Attorneys for ALLTEL Communications, Inc.

ROSHKA HEYMAN & DEWULF, PLC
TWO ARIZONA CENTER
400 NORTH 5TH STREET - SUITE 1000
PHOENIX, ARIZONA 85004
TELEPHONE NO 602-256-6100
FACSIMILE 602-256-6800

1 **Original and ten copies of the foregoing**
2 **filed this 11th day of October, 2000, with:**

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, Arizona 85007

7 **Copy of the foregoing hand-delivered**
8 **this 11th day of October, 2000, to:**

9 Legal Division
10 Arizona Corporation Commission
11 1200 West Washington Street
12 Phoenix, Arizona 85007

13 Marta Kalleberg
14 Utilities Division
15 Arizona Corporation Commission
16 1200 West Washington Street
17 Phoenix, Arizona 85007

18 **Copies of the foregoing mailed**
19 **this 11th day of October, 2000, to:**

20 Timothy Berg, Esq.
21 Fennemore Craig, P.C.
22 3003 N. Central Avenue
23 Suit 2600
24 Phoenix, Arizona 85016

25 M. Lauer
alltel/pl/motion to continue