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BEFORE THE ARIZONA CORPORATION COMMISSION

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**JEFF HATCH-MILLER**  
Chairman  
**MARC SPITZER**  
Commissioner  
**WILLIAM MUNDELL**  
Commissioner  
**MIKE GLEASON**  
Commissioner  
**KRISTIN MAYES**  
Commissioner

2006 JUN 30 P 2:58  
AZ CORP COMMISSION  
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**IN THE MATTER OF QWEST CORPORATION'S APPLICATION FOR ARBITRATION PROCEDURE AND APPROVAL OF INTERCONNECTION AGREEMENTS WITH AZCOM PAGING INC., HANDY PAGE, ANSWERPHONE INC., GLEN CANYON COMMUNICATIONS, INC., NEXTEL WEST CORP., AND TELE-PAGE, INC., PURSUANT TO SECTION 252(B) OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED BY THE TELECOMMUNICATIONS ACT OF 1996, AND THE APPLICABLE STATE LAWS**

DOCKET NOS. T-01051B-06-0175  
T-02556A-06-0175  
T-03693A-06-0175

**QWEST CORPORATION'S STATEMENT OF ISSUES REGARDING HANDY PAGE**

Qwest Corporation ("Qwest") hereby submits its statement of issues, with respect to the matters to be arbitrated between Qwest and Interstate Wireless, Inc. d/b/a Handy Page ("Handy Page"), pursuant to the Procedural Order in this docket issued on June 19, 2006. The issues identified by Qwest are as follows:

1. *Approval of Qwest's Proposed Type 1 and Type 2 Paging Agreement.*

This is the same issue for which Qwest asked for relief in its original Application For Arbitration Procedure and Approval of Interconnection Agreement ("Application") filed March 17, 2006. For the reasons stated in the Application, the Commission should find that the terms and conditions of the proposed Type 1 and Type 2 Paging Agreement are just and reasonable, are nondiscriminatory, meet all requirements of federal and state law, and are approved. Consistent

1 with such findings, the Commission should order the parties to sign the Agreement and file it  
2 with the Commission.

3 2. *Wide Area Calling is not Subject to Interconnection Arbitration.*

4 "Wide Area Calling" ("WAC") is a billing arrangement that is offered pursuant to the  
5 terms of Qwest's Arizona Access Service Price Cap Tariff.<sup>1</sup> Section 16.3.a of the tariff provides  
6 that WAC is a billing service by which Qwest will not assess toll charges on calls from Qwest's  
7 end users, in exchange for which Handy Page pays Qwest a per minute fee. Qwest's position is  
8 that: (a) no provision of federal or state law regarding interconnection requires an ILEC to  
9 provide wide area calling to a paging carrier; (b) the provision of WAC is not necessary for  
10 interconnection; (c) neither the design of WAC nor the charges for WAC are subject to  
11 arbitration; and (d) no disputes regarding the application or assessment of charges under the  
12 WAC tariff, past or future, are subject to arbitration under the Telecom Act of 1996.

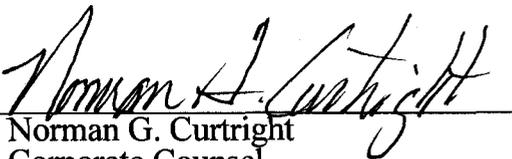
13 RESPECTFULLY SUBMITTED, this 30th day of June, 2006.

14

QWEST CORPORATION

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By:   
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20 ORIGINAL and 13 copies hand-delivered  
21 for filing this 30th day of June, 2006, to:

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22 Docket Control  
23 ARIZONA CORPORATION COMMISSION  
24 1200 West Washington Street  
25 Phoenix, AZ 85007

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<sup>1</sup> Arizona Access Service Price Cap Tariff, Section 16.3, Pages 1.3.

1 COPY of the foregoing hand delivered  
This 30th day of June, 2006, to:

2

3 Lyn Farmer, Chief Administrative Law Judge  
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5 Phoenix, AZ 85007

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16 Copy of the foregoing mailed and emailed  
this 12th day of June, 2006, to:

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