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FENNEMORE CRAIG
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Arizona Corporation Commission

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AZ CORP COMMISSION
DOCUMENT CONTROL

Attorneys for Qwest Corporation

BEFORE THE ARIZONA CORPORATION COMMISSION

RESIDENTS OF PRESCOTT VALLEY,
TRACY AND TROY DENTON, ET. AL.,

Docket No. T-01051B-02-0535

Complainants,

**NOTICE OF DEPOSITION: PURSUANT
TO ARIZ. R. CIV. P. 30(b)(6)**

vs.

QWEST CORPORATION,

Respondent.

You are hereby notified that, pursuant to Arizona Rule of Civil Procedure 30(b)(6), you, Arizona Corporation Commission Utility Division Staff ("Staff"), are hereby requested to designate and produce for deposition person or persons who consent to testify on your behalf as to matters known by or available to you with respect to the subjects listed below.

The deposition will be taken before a an officer authorized by law to administer oaths at the law offices of Fennemore Craig, 3003 N. Central Avenue, Suite 2600, Phoenix, Arizona 85012, (602) 916-5000, at 10:00 a.m. on December 10, 2002. The oral examination will continue from day to day thereafter on successive business days until completed.

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1 **Deposition Subject Matters to Include:**

2 1. The process and procedures utilized by the Arizona Corporation Commission
3 and/or Staff to ensure the provision of telecommunication services to customers requesting such
4 service who are either outside of a carrier's service area or are in a remote area of Arizona where
5 telecommunication services are not currently provided.

6 2. Telecommunication providers certified or otherwise approved by the Arizona
7 Corporation Commission to provide telecommunication services statewide whether facilities-
8 based, resellers, or a combination thereof.

9 3. Staff's experience with the policies, processes, factors considered, and methods
10 and standards applied in determining when a public utility provider has been providing service to
11 customer(s) in a discriminatory manner as the term "discriminatory" is defined and understood by
12 the Arizona Corporation Commission and Staff.

13 4. The policies, processes, factors considered, and methods and standards applied
14 when Staff makes a determination as to when a property is "contiguous" to a public utility
15 provider's service area as set forth in A.A.C. R14-2-502(B).

16 5. The development of, the purpose behind, practical application of, and penalties
17 assessed for violation, if any, under A.A.C. R14-2-502(B) for both monopoly (e.g. water) and
18 non-monopoly (e.g. telecommunication) public service providers.

19 6. The specific circumstances under which Staff believes that a monopoly and/or
20 non-monopoly public utility provider can provide service outside of its service territory

21 7. How the Arizona Corporation Commission does or would compensate a
22 telecommunication carrier for requiring that carrier to provide service outside of its service
23 territory.
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1 8. The process, manner and standards applied by Staff and/or the Arizona
2 Corporation Commission for implementation of 47 U.S.C. § 214(e)(3) including, but not limited
3 to, the determination of which carrier or carriers (including wireline, wireless and satellite) are
4 best able to provide service to a requesting community, and the working definition of the terms
5 “unserved” and “community.”

6 9. Staff’s experience with the process and application of Arizona rules regarding the
7 Universal Service Fund (“USF”), including, but not limited to, the process for disbursement of
8 USF or AUSF funds and the purpose behind and issues being addressed in AUSF Docket No.
9 RT-00000H-97-137.

10
11 DATED this 22nd day of November 2002.

12
13
14 By 

15 Timothy Berg
16 Theresa Dwyer
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28 22nd day of November, 2002:

29 Docket Control
30 ARIZONA CORPORATION COMMISSION
31 1200 West Washington
32 Phoenix, AZ

1 COPY delivered this 22nd day of November, 2002:

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7 Ernest Johnson
8 Utilities Division
9 ARIZONA CORPORATION COMMISSION
10 1200 West Washington
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12 Philip J. Dion III
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17 David M. Ronald
18 Legal Division
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22 A copy of the foregoing
23 was mailed this 22nd day of
24 November, 2002, to:

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