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AZ CORP COMMISSION Arizona Corporation Commission
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MAR - 2 2004

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IN THE MATTER OF QWEST CORPORATION'S FILING AMENDED RENEWED PRICE REGULATION PLAN.

DOCKET NO. T-01051B-03-0454

IN THE MATTER OF THE INVESTIGATION OF THE COST OF TELECOMMUNICATIONS ACCESS.

DOCKET NO. T-00000D-00-0672

SUPPLEMENT TO QWEST CORPORATION'S RESPONSE TO AT&T'S MOTION TO COMPEL

On November 28, 2003, AT&T of the Mountain States, Inc. ("AT&T") filed a motion to compel in the above-captioned Access Charge Docket (Docket No. T-00000D-00-0672). On December 15, 2003, Qwest Corporation ("Qwest") filed a response to that motion. On December 24, 2003, AT&T filed a reply in support of its motion. Both parties requested that oral argument be set on the motion.

On February 23, 2004, the Arizona Corporation Commission ("Commission") held a pre-hearing conference in the Renewed Price Regulation Plan Docket (Docket No. T-01051B-03-0454) for the purpose of scheduling a hearing on Qwest's proposed modified price cap plan and access charges. At that time the Commission consolidated that Access Charge Docket with the Renewed Price Regulation Plan Docket. On February 25, 2004, the Administrative Law Judge assigned to the matter issued a procedural order scheduling oral argument on AT&T's motion to compel and ordered that AT&T and Qwest file any updated information relative the motion by March 2,

1 2004.

2 At the time it responded to AT&T's motion to compel, Qwest objected to
3 providing AT&T with information pertaining to interexchange services as wholly
4 irrelevant to the Access Charge Docket, which, on its own, was established to determine
5 whether current access charges reflect the cost of access. However, in light of the
6 Commission's consolidation of that docket with the Renewed Price Regulation Plan
7 Docket, the scope of these proceedings has been broadened and Qwest no longer objects
8 to providing this information to AT&T insofar as the information relates only to Qwest,
9 and to the extent that Qwest did not object to these data requests on other grounds, such
10 as overly broad, requiring a special study, or being unduly burdensome.

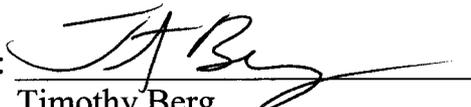
11 Qwest also continues to object to providing any such information regarding its
12 affiliates for the reasons set forth in its December 15, 2003 response. Affiliates of Qwest
13 are separate and distinct corporate entities over which Qwest has no authority or control.
14 To the extent that Qwest has any information concerning these affiliates, such
15 information is supplied directly by the affiliate subject to the same limitations as
16 information it receives from other entities with which it does business, including CLECs
17 like AT&T. Release of such information is not within Qwest's "control;" rather, it is
18 controlled by the third-party entity itself. It is that entity that determines whether such
19 information is publicly available or confidential. AT&T itself has objected to the release
20 of information it has provided to Qwest in similar circumstances. AT&T, of course,
21 remains free to seek such information directly from those entities.

22 Additionally, although Qwest has no objection to providing its own information in
23 response to AT&T's data requests, such requests may be premature at this juncture of the
24 proceedings. Qwest has not yet made any pricing proposal in this docket. Pursuant to
25 Decision No. 66772, Qwest will make an A.C.C. R14-2-103 filing in this matter. To the
26 extent this filing includes a revised proposal for access charges, the discovery currently

1 undertaken by AT&T may be irrelevant and outdated. At the time Qwest makes its
2 A.C.C. R14-2-103 filing, all parties will be able to conduct discovery on the proposals
3 actually made by Qwest and the supporting cost information for such proposals. It seems
4 cumulative and premature to request such cost and price information prior to that filing.

5 RESPECTFULLY SUBMITTED this 2nd day of March, 2004.

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