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BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

Arizona Corporation Commission

DOCKETED

MIKE GLEASON, Chairman  
WILLIAM A. MUNDELL  
JEFF HATCH-MILLER  
KRISTIN K. MAYES  
GARY PIERCE

AUG 14 2007

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T-00000D-00-0672

IN THE MATTER OF THE REVIEW AND  
POSSIBLE REVISION OF ARIZONA UNIVERSAL  
SERVICE FUND RULES, ARTICLE 12 OF THE  
ARIZONA ADMINISTRATIVE CODE.

Docket No. RT-00000H-97-0137

COMMENTS OF AT&T

GALLAGHER & KENNEDY, P.A.  
2575 E. CAMELBACK ROAD  
PHOENIX, ARIZONA 85016-9225  
(602) 530-8000

Pursuant to the Procedural Order entered in these dockets dated July 27, 2007, AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively referred to as "AT&T") file these comments in support of Arizona Corporation Commission ("Commission") Staff's recommendation to combine the Access Charge Docket (Docket No. T-00000D-00-0672) with the Arizona Universal Service Fund Docket (Docket No. RT-00000H-97-0137). AT&T supports the consolidation of the two dockets primarily because the Arizona Universal Service Fund represents an alternative revenue source for carriers impacted by access charge policy reform.

Arizona has some of the highest intrastate access fees in the country. AT&T supports reductions in intrastate access charges and believes that such reductions can be implemented in a revenue neutral manner. Excessively high access charges substantially reduce the incentive of interexchange carriers to deploy infrastructure and market their services to consumers in Arizona because the cost to provide service is artificially inflated. Also, high intrastate access fees translate into higher intrastate long distance rates charged to consumers and fewer choices being

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1 available. Therefore, AT&T believes that a comprehensive review of the current access charge  
2 regulatory regime needs to be conducted.

3         Based on the language of the Procedural Order,<sup>1</sup> it appears that the regulatory policies  
4 regarding the intrastate access charges for both incumbent local exchange carriers (“ILECs”) and  
5 competitive local exchange carriers (“CLECs”) will be addressed in this docket with the  
6 exception of Qwest Corporation. If that is not the Commission’s intent, the scope of the  
7 proceeding should be clarified.

8         Both the Access Charge docket and the Arizona Universal Service Fund docket have  
9 been pending for a substantial period of time. Since the dockets were initiated, there have been  
10 significant developments in the telecom industry, including several significant consolidations  
11 between wireline long distance and local companies. Further, and perhaps more importantly, the  
12 long distance market has become increasingly competitive as customers turn to alternative  
13 technologies such as wireless service offered by multiple providers in each major market and  
14 Internet-based alternatives including email, instant messaging and VoIP services. This changing  
15 marketplace has put substantial pressure on wireline providers to reduce long distance rates in  
16 order to remain competitive and correspondingly has driven margins down. Thus, the margins  
17 once associated with wireline long distance service, which provided an implied subsidy to  
18 support local service in the form of high access charges, are no longer available.

19         Given these and other changes in the industry, AT&T recommends that a procedural  
20 schedule be established that allows all parties the opportunity to submit new comments in this  
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23 <sup>1</sup> “Phase II of the Access Charge Docket is intended to address access charges for all other telephone companies that  
24 provide access services.” Procedural Order at p. 1.

1 rulemaking docket that reflect the current marketplace. Further, the parties should be given the  
2 opportunity to file reply comments to address the comments and recommendations of the other  
3 parties.

4 In summary, AT&T supports Staff's recommendation to consolidate the two dockets.  
5 AT&T recommends that a procedural schedule be established that allows the parties to submit  
6 new information reflective of the current marketplace and provides all parties the opportunity to  
7 respond to the comments and recommendations of the other participants in the consolidated  
8 docket.

9 As a procedural matter, please address all future filings and correspondence on this  
10 matter to:

11 Michael M. Grant  
12 Gallagher & Kennedy, P.A.  
13 2575 East Camelback Road  
14 Phoenix, Arizona 85016-9225  
15 Fax: (602) 530-8500  
16 Email: [mmg@gknet.com](mailto:mmg@gknet.com)

17 – and –

18 Dan Foley  
19 AT&T Nevada  
20 645 East Plumb Lane, B132  
21 P.O. Box 11010  
22 Reno, Nevada 89520  
23 Fax: (775) 333-2175  
24 Email: [dan.foley@att.com](mailto:dan.foley@att.com)

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RESPECTFULLY SUBMITTED this 14<sup>th</sup> day of August, 2007.

GALLAGHER & KENNEDY, P.A.

By Michael M. Grant

Michael M. Grant  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225  
Attorneys for AT&T Communications of the  
Mountain States, Inc. and TCG Phoenix

**Original and 13 copies** filed this  
14<sup>th</sup> day of August, 2007, with:

Docket Control  
Arizona Corporation Commission  
1200 West Washington  
Phoenix, Arizona 85007

**Copies** of the foregoing text mailed  
the 13<sup>th</sup> day of August, 2007, to the  
parties listed on the service list attached  
to the July 27, 2007 Procedural Order.

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