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BEFORE THE ARIZONA CORPORATION COMMISSION

2001 JUN -7 P 4: 22

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3 WILLIAM A. MUNDELL
Chairman

AZ CORP COMMISSION
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Arizona Corporation Commission

DOCKETED

4 JIM IRVIN
Commissioner

JUN 07 2001

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6 MARC SPITZER
Commissioner

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7 IN THE MATTER OF THE APPLICATION FOR
8 EMERGENCY RULEMAKING FOR RULES TO
9 ADDRESS SLAMMING AND OTHER
DECEPTIVE PRACTICES

DOCKET NO. RT-00000J-99-0034

10 COMMENTS ON PROPOSED RULES

11 Midvale Telephone Company, Inc.; Accipiter Communications, Inc.; Table Top
12 Telephone Company; Valley Telephone, Inc.; Arizona Telephone Company;
13 Southwestern Telephone Company; VoiceStream Communications; Western Wireless,
14 Inc.; and OnePoint Communications, Inc., through the undersigned counsel, file their
15 initial Comments in the above-captioned proceeding. These telecommunications
16 providers in Arizona only recently received a copy of the proposed regulations on
17 "slamming" and "cramming," and have not had an opportunity to formulate detailed
18 comments.

19 A cursory review of the proposed regulations leads them to conclude that they may
20 be excessive, overly burdensome on providers and customers, counter-productive to their
21 intended goal, and (as to the proposed penalties for non-compliance) beyond the
22 Commission's statutory and constitutional authority. However, these carriers are sensitive
23 to the consumer problems caused by certain carriers that these proposed Commission rules
24 are attempting to address and look forward to working with the Commission to better
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26

Snell & Wilmer

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refine the scope and substance of the rules, beginning with the proposed workshop on
June 13th.

RESPECTFULLY SUBMITTED this 7th day of June, 2001.

SNELL & WILMER



Jeffrey C. Crockett
Thomas L. Mumaw

Attorneys for the above Arizona
Telecommunications Providers