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VIA OVERNIGHT DELIVERY

1 March 1999

Mr. Jack Rose, Executive Secretary
Arizona Corporation Commission
1200 West Washington Street
Phoenix, AZ 85007

Re: In the Matter of Implementation of FCC's Anti-Slamming Rules, Docket Number
RT-00000J-99-0034.

Dear Mr. Rose:

The Telecommunications Resellers Association (TRA), on behalf of its members writes in support of the February 10, 1999 Motion to Dismiss filed by AT&T Communications of the Midwest, Inc. ("AT&T"). TRA agrees that filed by US West Communications, Inc.'s ("US West") petition for immediate adoption of the Federal Communications Commission's ("FCC") slamming rules is premature and unwarranted.

TRA is a national industry association representing nearly 800 small to medium-sized member companies nation-wide, including seven Arizona-based firms, engaged in the provision of local, interexchange, wireless, and enhanced services, primarily on a resold basis. TRA was created, and carries a continuing mandate, to foster and promote telecommunications resale, to support the telecommunications industry, and to protect the interests of entities engaged in the resale of telecommunications services.

Given the growing competitive telecommunications market, unified national anti-slamming rules, such as those adopted by the FCC may ultimately be desirable. Yet, the FCC has sought further comment on additional anti-slamming measures, such as penalties to be paid to authorized carriers by unauthorized carriers; modification and clarification of verification requirements; and implementation of a third party administrator requirement for execution of preferred carrier changes and preferred carrier freezes. These rules are still being finalized. It is not yet completely clear what the full scope of those rules will be. To implement the FCC rules now, only to have to revisit and revise them, would be an unnecessary expenditure of Commission time and resources.

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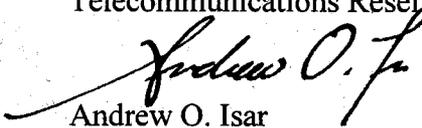
Further, it appears from a review of US West's Petition that US West would have the Commission make immediate application of new federal requirements to the competitors' existing marketing materials. Such a request is contrary to established public policy concerns, is violative of the competitors' due process rights, and, moreover, is completely preposterous.

US West has wholly failed to make a showing of any emergency basis for immediate application of the FCC anti-slamming rules. Indeed, in its Petition, US West proceeds to use its own unsubstantiated, unpublished "poll" as evidence of the competitors' non-compliance with rules that are not yet effective under the law, in order to bootstrap an argument for immediate implementation of those rules on the state level in Arizona. Clearly, such "evidence" should be disregarded by the Commission in making its decision.

Application of the FCC anti-slamming rules prior to finalization is a premature step, and a potential waste of valuable Commission time and resources. Neither an emergency nor good cause to warrant the immediate application of Federal anti-slamming rules in the State of Arizona has been demonstrated by US West. US West's Petition is nothing more than yet another thinly veiled attempt to thwart competition by focusing negative publicity on would-be competitors and diverting attention away from the true issue; the fact that US West has yet to fully open its local markets to competition. TRA joins AT&T in urging the Commission to dismiss US West's Petition.

Sincerely,

Telecommunications Resellers Association


Andrew O. Isar