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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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COMMISSIONERS

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

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

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

DOCKET NO. T-00000D-00-0672

**ALECA'S MOTION FOR
CONTINUANCE OF
PROCEDURAL SCHEDULE**

On February 12, 2008, the Administrative Law Judge issued a Procedural Order that i) ordered the parties to file a matrix or list of issues and their procedural recommendations by May 1, 2008; ii) scheduled a Procedural Conference to be held on May 8, 2008, for the purpose of determining the procedures and schedule for the above-captioned consolidated matters; and iii) ordered that the parties may request a continuance of the May 8, 2008 Procedural Conference if they believe the process would benefit from additional time for their discussions.

Pursuant to the Procedural Order, the parties conferred on several occasions (through in-person and telephonic meetings) to determine if consensus could be reached on any of the substantive or procedural issues identified in the previously filed comments. Although these were productive meetings, the parties determined that additional information would be required for the parties to determine if consensus could ultimately be reached on various substantive and legal issues that were discussed. To assist in this determination, the Arizona Local Exchange Carriers Association ("ALECA") agreed to

1 gather and provide to the parties, aggregate ALECA member data that will estimate the
2 revenue expected to be lost by reducing state access rates to various target levels.
3 ALECA anticipates that it will take approximately 60 to 90 days to complete this task.
4 The parties will then need additional time to analyze this data in assessing various
5 proposals put forth associated with access reduction, including potential legal issues
6 associated therewith.

7 Based upon the discussion on the last telephonic conference call that was held
8 between the parties, there did not appear to be any objection to a continuance of the
9 procedural schedule to accommodate the parties' efforts. Accordingly, ALECA hereby
10 requests that the requirement for the parties to file a matrix or list of issues and their
11 procedural recommendations by May 1, 2008 be continued until September 5, 2008.
12 ALECA further requests that the May 8, 2008, Procedural Conference be continued and
13 rescheduled to be held on or after September 12, 2008.

14 RESPECTFULLY SUBMITTED this 18th day of April, 2008.

15 SNELL & WILMER

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- 1 ORIGINAL and 15 copies filed this
- 2 18th day of April, 2008 with:
- 3 Docket Control
- 4 Arizona Corporation Commission
- 5 1200 West Washington
- 6 Phoenix, Arizona 85007
- 7 COPY of the foregoing hand-delivered
- 8 this 18th day of April, 2008 to:
- 9 Maureen A. Scott, Senior Staff Counsel
- 10 Legal Division
- 11 Arizona Corporation Commission
- 12 1200 West Washington Street
- 13 Phoenix, AZ 85007
- 14 Ernest Johnson Director
- 15 Utilities Division
- 16 Arizona Corporation Commission
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- 19 Jane L. Rodda, Administrative Law Judge
- 20 Hearing Division
- 21 Arizona Corporation Commission
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- 24 COPY of the foregoing mailed/e-mailed
- 25 this 18th day of April, 2008 to:
- 26 SEE ATTACHED SERVICE LIST

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