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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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

Docket No. RT-00000H-97-0137

14 IN THE MATTER OF THE INVESTIGATION OF
15 THE COST OF TELECOMMUNICATIONS
16 ACCESS

Docket No. T-00000D-00-0672

17 COX ARIZONA TELCOM'S STATEMENT ON ISSUES

18 Cox Arizona Telcom, LLC ("Cox"), through undersigned counsel, hereby submits its
19 recommendations on certain initial issues that were identified during industry meetings related to
20 this docket.

21 While a number of key issues have been identified by ALECA, there has been no clear
22 consensus by the parties on any of the issues. Cox's position remains unchanged on how best to
23 proceed with these dockets and the issues identified by ALECA. Cox still believes that any
24 substantive action in these dockets should await further action by the FCC. There are pending
25 dockets at the FCC concerning review of Intercarrier Compensation that will ultimately set the
26 stage for federal reform. See In the Matter of Universal Service Contribution Methodology, WC
27 Docket No. 06-112; In the Matter of the High-Cost Universal Service Support and Federal-State
Joint Board on Universal Service, WC Docket 05-337, CC Docket 96-45; In the Matter of
Developing a Unified Intercarrier Compensation Regime, WC Docket No. 01-92; In the Matter of
Intercarrier Compensation for ISP-Bound Traffic, CC Docket No. 99-68; and In the Matter of
Access Charge Reform, CC Docket No. 96-262. It is possible that some action will be taken by

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1 the FCC before the end of the year and moving forward at the state level at this time has the
2 potential to result in conflicting reforms. The time and effort of the parties should be reserved as
3 it has become clear that FCC action is imminent. As Cox stated in its Reply Comments filed in
4 this docket, any state proceedings should mirror or at least recognize the federal scheme. Waiting
5 until the FCC takes action will prevent all parties from expending additional time and resources
6 on a possible conflicting state proposal.

7 Since the beginning of 2008, the parties have discussed a number of issues related to
8 access charge reform and AUSF support. It is apparent that the parties will not come to any clear
9 consensus over many of the issues. Proceeding with this docket will require more time, extensive
10 testimony, hearings and a proposed ruling from the ALJ. This will most likely take 6 -12
11 additional months. Cox understands that the FCC is very close to finalizing its proposal on
12 Intercarrier Compensation which will address many of the very issues raised in these proceedings.
13 Barring any extraordinary action, it is possible we may finally see the federal regime by year's
14 end. Continuing down a state path when the FCC is this close to releasing its proposal does not
15 appear to be the best use of the parties' limited resources. Cox believes that this docket should be
16 suspended until the FCC issues its Intercarrier Compensation reform order.

17 RESPECTFULLY SUBMITTED this 7th day of October 2008.

18 **COX ARIZONA TELCOM, LLC**

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