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**BEFORE THE ARIZONA CORPORATION COMMISSION  
RECEIVED**

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CHAIRMAN  
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COMMISSIONER  
JEFF HATCH-MILLER  
COMMISSIONER  
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COMMISSIONER  
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COMMISSIONER

2008 OCT -7 P 4: 29

AZ CORP COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission  
DOCKETED

OCT -7 2008

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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

**ARIZONA PAYPHONE ASSOCIATION'S COMMENTS RE MATRIX/LIST  
OF ISSUES**

Pursuant to the Procedural Order entered on August 20<sup>th</sup>, 2008 in this consolidated proceeding, the Administrative Law Judge ordered the parties to file a matrix or list of issues and procedural recommendations. The Parties to this Docket have worked to submit a list of ten issues to the Administrative Law Judge. If a party's issue is not encompassed by those itemized issues, then that party will submit that issue as an additional item.

1 Arizona Payphone Association (“APA”) does not take a position on issues 1-10,  
2 but reserves the right to do so at a later time. However, APA does want to add the  
3 following:  
4

5 **Issue Number 11:** How will the outcome of the Arizona Universal Service  
6 Fund/Access Docket(s) affect payphone providers’ rates and operating expense and by  
7 extension, how will it affect the economically challenged, the remotely located, the  
8 tourist, the run-away, the battered spouse, and those in need who will ultimately be  
9 forced to either pay more to make a payphone call or risk losing access to public  
communications if payphone operators can no longer maintain any profitability due to  
increased costs and will be forced to remove more public phones?

10 If this occurs, the State of Arizona may end up being the provider of last resort  
11 in order to maintain the availability of public communication for citizens in need and  
12 for emergency purposes. Additionally, in 2004, Governor Janet Napolitano created the  
13 Governor's Council on 2-1-1 by Executive Order. Arizona citizens will be able to  
14 access disaster response and homeland security information through the 2-1-1 system,  
15 including assistance locating disaster relief organizations and services, obtaining  
16 accurate updates regarding threats and disasters and identifying opportunities to  
17 volunteer in their communities by accessing the web and dialing 2-1-1 in Phase II. If  
18 in a disaster, public payphones are no longer available because payphone providers  
19 cannot afford to maintain them due to increasing costs, then the 2-1-1 system will be a  
20 waste of resources as the citizens of Arizona will not be able to call 2-1-1 in an  
21 emergency. As a reminder, there were no working cell phones in Manhattan or New  
22 Orleans during their disasters.  
23  
24  
25



1 Original and 15 copies filed  
2 on October 7th, 2008 with:

3 Docket Control  
4 Arizona Corporation Commission  
5 1200 West Washington  
6 Phoenix, Arizona 85007

7 Copy of the foregoing mailed or emailed  
8 on October 7th, 2008 to:

9 Docket Control  
10 Arizona Corporation Commission  
11 1200 West Washington  
12 Phoenix, Arizona 85007

13 Copy of the foregoing mailed or emailed  
14 on October 7, 2008 to:

15 Jane Rodda, Esq.  
16 Administrative Law Judge  
17 Hearing Division  
18 Arizona Corporation Commission  
19 400 W. Congress  
20 Tucson, Arizona 85701  
21 [jrodda@azcc.gov](mailto:jrodda@azcc.gov)

22 Maureen Scott, Esq.  
23 Senior Attorney  
24 Arizona Corporation Commission  
25 1200 West Washington  
Phoenix, Arizona 85007  
[msscott@azcc.gov](mailto:msscott@azcc.gov)

Dan Pozefsky, Chief Counsel  
Residential Utility Consumer Office  
1110 West Washington, Suite 220  
Phoenix, Arizona 85007  
[dpozefsky@azruco.gov](mailto:dpozefsky@azruco.gov)

...

1 Reed Peterson  
2 Qwest Corporation  
3 20 East Thomas Road, 16<sup>th</sup> Floor  
4 Phoenix, Arizona 85012

4 Isabelle Salgado  
5 Dan Foley  
6 AT&T Nevada  
7 645 E. Plumb Lane, B132  
8 P.O. Box 11010  
9 Reno, Nevada 89520  
10 [dan.foley@att.com](mailto:dan.foley@att.com)  
11 [gc1831@att.com](mailto:gc1831@att.com)

9 Joan S. Burke  
10 Osborn Maledon, PA  
11 2929 N. Central Ave., Ste. 2100  
12 Phoenix, Arizona 85012  
13 [jburke@omlaw.com](mailto:jburke@omlaw.com)  
14 Attorneys for Time Warner Telecom  
15 Attorneys for XO Communications

14 Michael W. Patten  
15 Roshka De Wulf & Patten, PLC  
16 One Arizona Center  
17 Phoenix, Arizona 85004  
18 [mpatten@rdp-law.com](mailto:mpatten@rdp-law.com)  
19 Attorneys for Cox Arizona Telecom, LLC  
20 Attorneys for McLeod USA

19 Lyndall Nipps  
20 Vice President, Regulatory  
21 Time Warner Telecom  
22 845 Camino Sur  
23 Palm Springs, California 92262  
24 [Lyndall.Nipps@twtelecom.com](mailto:Lyndall.Nipps@twtelecom.com)

23 Craig A. Marks  
24 Craig A. Marks, PLC  
25 10645 N. Tatum Blvd., Suite 200-676  
Phoenix, Arizona 85028  
[Craig.Marks@azbar.org](mailto:Craig.Marks@azbar.org)  
Attorney for ALECA

1 Dennis D. Ahlers  
2 Associate General Counsel  
3 Eschelon Telecom, Inc.  
4 730 Second Avenue, Suite 900  
5 Minneapolis, MN 55402  
6 [ddahlers@eschelon.com](mailto:ddahlers@eschelon.com)

7 Michael M. Grant  
8 Gallagher & Kennedy  
9 2575 East Camelback Road  
10 Phoenix, Arizona 85016  
11 [mmg@gknet.com](mailto:mmg@gknet.com)  
12 Attorneys for AT&T

13 Dennis D. Ahlers  
14 Associate General Counsel  
15 Integra Telecom, Inc.  
16 730 Second Avenue, Suite 900  
17 Minneapolis, MN 55402  
18 [ddahlers@eschelon.com](mailto:ddahlers@eschelon.com)

19 Thomas Campbell  
20 Michael Hallam  
21 Lewis and Roca LLP  
22 40 N. Central Avenue  
23 Phoenix, Arizona 85004  
24 [tcampbell@lrlaw.com](mailto:tcampbell@lrlaw.com)  
25 [mhallam@lrlaw.com](mailto:mhallam@lrlaw.com)  
Attorneys for Verizon

Norm Curtright  
Qwest Corporation  
20 East Thomas Road, 16<sup>th</sup> Floor  
Phoenix, Arizona 85012

Rex Knowles  
Executive Director-Regulatory  
XO Communications  
111 E. Broadway, Suite 100  
Salt Lake City, Utah 84111  
[Rex.knowles@xo.com](mailto:Rex.knowles@xo.com)

1 Arizona Payphone Association  
2 c/o Gary Joseph  
3 Sharenet Communications  
4 4633 West Polk Street  
5 Phoenix, Arizona 85043  
6 [garyj@nationalbrands.com](mailto:garyj@nationalbrands.com)

7 Charles H. Carrathers, III  
8 General Counsel, South Central Region  
9 Verizon, Inc.  
10 HQEO3H52  
11 600 Hidden Ridge  
12 Irving, Texas 75015-2092  
13 [Chuck.carrathers@verizon.com](mailto:Chuck.carrathers@verizon.com)

14 Nathan Glazier  
15 Regional Manager  
16 Alltel Communications, Inc.  
17 4805 E. Thistle Landing Drive  
18 Phoenix, Arizona 85044  
19 [Nathan.glazier@alltel.com](mailto:Nathan.glazier@alltel.com)

20 Arizona Dialtone, Inc.  
21 Thomas W. Bade, President  
22 717 W. Oakland Street  
23 Chandler, Arizona 85226  
24 [tombade@arizonadialtone.com](mailto:tombade@arizonadialtone.com)

25 Mark A. DiNunzio  
26 Cox Arizona Telcom, LLC  
27 1550 West Deer Valley Road  
28 MS DV3-16, Bldg C  
29 Phoenix, Arizona 85027  
30 [Mark.dinunzio@cox.com](mailto:Mark.dinunzio@cox.com)

31 OrbitCom, Inc.  
32 Brad Van Leur, President  
33 1701 N. Louise Avenue  
34 Sioux Falls, South Dakota 57107  
35 [bvanleur@svtv.com](mailto:bvanleur@svtv.com)

1 William A. Hass  
2 Deputy General Counsel  
3 McLeodUSA Telecommunications Services, Inc.  
4 6400 C. Street SW  
5 Cedar Rapids, Iowa 52406  
6 Bill.haas@mcleodusa.com

7 Chris Rossie  
8 President, Local 7019  
9 Communication Workers of American  
10 11070 North 24<sup>th</sup> Avenue  
11 Phoenix, Arizona 85029

12 Greg L. Rogers  
13 Senior Corporate Counsel  
14 Level 3 Communications, LLC  
15 1025 Eldorado Boulevard  
16 Broomfield, Colorado 80021

17 Ms. Janice Alward, Chief Counsel  
18 Legal Division  
19 Arizona Corporation Commission  
20 1200 West Washington Street  
21 Phoenix, Arizona 85004

22 Ernest Johnson, Director  
23 Utilities Division  
24 Arizona Corporation Commission  
25 2100 West Washington Street  
Phoenix, Arizona 85007

Arizona Reporting Service, Inc.  
2200 North Central Avenue, Suite 502  
Phoenix, Arizona 85004

22 *Donnelly Herbert*  
23 \_\_\_\_\_