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**ORIGINAL
MEMORANDUM**

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TO: Docket Control
Arizona Corporation Commission

FROM: Ernest G. Johnson
Director
Utilities Division

AZ CORP COMMISSION
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DATE: December 21, 2001

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RE: Valley Telephone Cooperative's Request for Extension of Time for
Permissive Dialing; Decision No. 63982; Docket No. T-00000~~A~~-99-0641

On December 19, 2001, Valley Telephone Cooperative ("VTC") filed a request for an extension of time to comply with Decision No. 63386, dated February 16, 2001.

In Decision No. 63386, the Commission ordered that "mandatory dialing begin on January 5, 2002" (p. 15, ll. 15-18). VTC requests an extension of time to April 5, 2002 for implementation of mandatory dialing for three of its wireless office codes (520-507, 508 and 678).

The Company's implementation of a new office code in the Safford rate center provides VTC wireless customers residing in Safford the means to have dialing parity with wireline customers in the Safford exchange if they so desire. Additionally, Qwest has agreed, subject to Staff concurrence, to retain permissive dialing translations in its switches located in the Tucson LATA that are moving to the new 928 area code for the time frame requested.

Staff believes that the requested extension provides a reasonable period of time for VTC to implement its new office code, allow effected VTC wireless customers to make a determination of a preferred office code for their service, and for VTC to provide additional customer education. Staff therefore recommends the dialing plan currently in place for permissive dialing from Qwest 928-348, 425, 428, 473 and 485 to VTC wireless 520-507, 508 and 678 be continued and that the Company's request for an extension of time for implementation of mandatory dialing for these codes to April 5, 2002 be granted.

EGJ:RLB:mi

cc: Compliance Section
Judy Bruns, Valley Telephone Cooperative
John Duffy, Qwest Corporation
Joe Cocke Sr., NANPA Western Region



Valley Telephone Cooperative Copper Valley Telephone Valley Connections, LLC

Valley Telecommunications - Cellular - Internet - Business Systems

December 19, 2001

Mr. Pat Williams, Compliance Manager
Arizona Corporation Commission
1200 West Washington
Phoenix, AZ 85007

Re: Docket # T-00000F-99-0641- Request for extension.

Dear Mr. Williams:

Valley Telecommunications Company, Inc. requests the Commission to extend the permissive dialing period for an additional 90 days in the Safford-Pima-Thatcher 928 NPA service area. This would be an extension from January 5, 2002 for a period of 90 days to April 5, 2002.

Due to the Geographic split of the NPA 928 crossing LATA boundaries, Qwest landline customers in this serving area when calling wireless customers of Valley Telecommunications Company, Inc. will be required to dial 1+10 digits to access these wireless phones. Valley feels that this gives our common customer the illusion that this call will be a toll call when in fact with our Wide Area Calling (WAC) agreements with Qwest it is actually a local call to a foreign NPA. Valley currently has three prefixes (NXX) in the 520 NPA and those are 508, 507 and 678 and cover the RSA area of Cochise, Graham and Greenlee Counties in Arizona. Valley was not allowed to grandfather these NXXs in the new 928 NPA because our switch was in the 520 NPA thus causing the unusual dialing pattern of Qwest tariff of 1+10 digit dialing that will go into effect permanently on January 5, 2002.

We have worked with Qwest on this dialing pattern and they have agreed to modify translations to extend permissive dialing for 90 days until Valley can implement a new NXX for this 928 area. Valley Telecommunications Company, Inc. filed for a new Central Office Code (NXX) on December 7, 2001. This code was granted on December 14, 2001 and Valley was notified by fax from Neustar Inc. on December 18, 2001 that it had been assigned a new code for the 928 NPA. That new code is 928-965. This code will not go into effect until February 18, 2002, which is 66 days from the date granted of December 14, 2001.

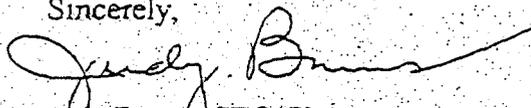
The request for extension of permissive dialing in the Safford service area only will enable Valley to implement the new code, notify all routing and rating information entities and provide customer education, number change and re-programming of phones in our wireless area to provide those customers a "local wireless number" thus eliminating the need for these landline customers to dial 1+ 10 digits to complete calls to the wireless phones in the Safford-Pima-Thatcher service area.

The Safford-Pima-Thatcher service area is served on the landline today by Qwest and is served by Valley Telecommunications Company, Inc. and Cellular One on the wireless side.

Please consider this request for an extension of permissive dialing for this area only until Valley can implement the new NXX and complete customer education. This extended date will be April 5, 2002. Qwest cannot extend this permissive dialing in this area or do the needed translations to their switch without an order from the Commission.

This request is for the Safford-Pima-Thatcher 928-NXX (428,348,485) area only.

Sincerely,



Judy Bruns, CEO/GM

Cc: Mr. Richard Boyles

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