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BEFORE THE ARIZONA CORPORATION COMMISSION
AZ CORP COMMISSION

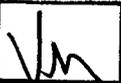
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Generic Investigation on Industry)
Petition for Approval of an NPA Relief) T-00000F-99-0641
Plan for the 520 NPA.)

WorldCom, Inc. ("WCom") submits the following responsive comments addressing comments filed by U S WEST Communications, Inc., n/k/a Qwest Corporation ("Qwest") in Docket No. T-0000F-99-0641, regarding NPA relief for the 520 area code.

Qwest believes an all-services overlay for the entire geographic area currently served by the 520 NPA is the most customer friendly solution for number exhaust, because it allows customers to keep their existing 10-digit telephone numbers and consequently are not inconvenienced with the many problems associated with traditional are code splits.

Overlays may present some advantages over geographic splits. For instance, it is true that, existing customers would not need to change their 10-digit telephone numbers, and future relief can be readily accomplished through additional overlays.

However, this is not to say, that overlays are a panacea, or that overlays should now become the presumed method of area code relief. Like area code splits, overlays bring their own associated costs. For example, overlays require customers to dial 10-digits, instead of 7, for all local calls. In addition, it may require the re-programming of

automatic dialers and the need for many small business customers to upgrade their current telephone equipment to accommodate the need for mandatory 10-digit dialing. Also, the traditional geographic significance of an area code is diluted when a new area code is implemented as an overlay to an existing area code. Further, the FCC has recognized there are significant negative consequences for new competitive local exchange entrants from overlays. NPA 520 is a very large geographic area where new competitive markets have not even opened up to competitive local exchange carriers. Implementing an overlay in this large of an area, could be a barrier to new local exchange carriers since incumbents have a large reserve of telephone numbers in the more familiar 520 NPA. This extremely anti-competitive system of NXX "have" and "have-nots" is what the FCC recognized as a significant negative barrier for new entrants.

Qwest states that overlays provide a "long term" solution. WCom believes this is a misconception, since an overlay once, implemented does not necessarily create any longer term solution than an area code split. Overlays quite simply provide a "permanent" solution and, therefore, take away options for the Commission for any future solution to area code relief. Once an overlay is implemented there is no other solution available to the Commission but to implement another overlay.

Qwest goes on to state that overlays provide number conservation but does not clearly define how. WCom would encourage the Commission to require Qwest to explain how an overlay provides number conservation.

Dated: July 27, 2000

WorldCom, Inc.

By: 

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and

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CERTIFICATE OF SERVICE

I hereby certify that the original and ten copies of the enclosed document were sent via Airborne Express to the Arizona Corporation Commission on this 17th day of July, 2000. In addition, a true and correct copy was sent via United States First Class Mail to the following parties:

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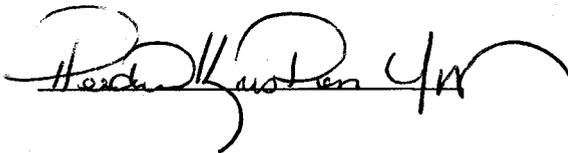
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A handwritten signature in black ink, appearing to read "Kimberly Hunter". The signature is written in a cursive style with a long, sweeping underline that extends to the right.