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Arizona Corporation Commission
DOCKETED

July 14, 2000

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520 NPA Relief Docket

Docket No. T-00000F-99-0641

Reply Comments of Cox Arizona Telcom, L.L.C.

DOCKETED BY	
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Dear Ms. Scott:

Cox Arizona Telcom, L.L.C. ("Cox") has reviewed the comments filed in this docket by WorldCom, AT&T and US West/Qwest. Cox believes that its initial comments sets forth its position relative to the other comments and the Commission should not construe Cox's lack of response to specific assertions as acquiescence to those statements. However, Cox must respond to US West's unfounded implication (at p. 2 of its comments) that an overlay conserves numbers. That is not the case. Indeed, NeuStar's analysis of relief options indicated that an overlay will provide a *shorter* period of relief than a geographic split.

Please contact me if you have any questions or would like additional information on Cox's position on 520 NPA relief.

Sincerely,

Michael W. Patten

Ms. Deborah R. Scott
 Director, Utilities Division
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MWP:djj

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