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BEFORE THE ARIZONA CORPORATION COMMISSION

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COMMISSIONER

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AZ CORP COMMISSION  
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IN THE MATTER OF INVESTIGATION )  
INTO U S WEST COMMUNICATION, )  
INC.'S COMPLIANCE WITH CERTAIN )  
WHOLESALE PRICING REQUIREMENTS )  
FOR UNBUNDLED NETWORK ELEMENTS )  
AND RESALE DISCOUNTS. )

DOCKET NO: T-00000A-00-0194

**WORLDCOM'S RESPONSE TO MOTION OF COMMISSION STAFF  
FOR CLARIFICATION OF PROCEDURAL ORDER AND FOR  
EXTENSION OF THE DEADLINE FOR FILING TESTIMONY, OR IN THE  
ALTERNATIVE, MOTION TO REVIEW ALL WHOLESALE PRICES PREVIOUSLY  
APPROVED BY THE COMMISSION IN 1997, AND LIST OF ISSUES FOR PHASE III**

WorldCom, Inc., on behalf of its regulated subsidiaries ("WCom"), responds to Staff's Motion for Clarification. WCom agrees with Staff's assertion that in this proceeding, the Commission intended to include a review of the present unbundled network element ("UNE") rates as well as other prices previously established by the Commission in October 1997 in the earlier consolidated arbitration proceedings. However, Qwest has prefiled no testimony addressing existing rates in this phase of this docket, with possible exception of some collocation rates.

When this Commission approved rates for interconnection, UNEs, and resold telecommunications services in the consolidated arbitration docket in 1997, the Commission clearly contemplated a review of those rates after approximately one year.

In the special open meeting held on October 27, 1997, Chairman Kunasek stated: "I would expect that we would have to come back and revise and clarify and perhaps change some of the figures. I don't feel like anything that we are going to do here today is cast in stone, and I would like to assure everyone that I certainly would be open to a continuing process here. I

1 would agree that perhaps some time, rational amount of time, perhaps a year, would be necessary  
2 to determine the effect that what we are doing here will have.” (Transcript, Consolidated  
3 Arbitration Deliberations, October 28, 1997, p. 29, Ls. 13-23.)

4 In the special open meeting held on January 8, 1998, when the Commission considered  
5 applications for rehearing and reconsideration of the Commission’s rulings entered in October  
6 1997, Chairman Irvin stated: “Also as I recall, when this docket first started, that the Hearing  
7 Officer also suggested that we take a look at this for a year and be prepared to revisit it, if  
8 necessary. It’s a very complex and difficult issue, and I certainly would have no problem to  
9 revisit it, if the numbers and calculations prove to be wrong.” (Transcript, Consolidated  
10 Arbitration Deliberations, January 8, 1998, p. 315, Ls. 12-18.)

11 More than 3 years have elapsed since the Commission set the present rates for  
12 interconnection, UNEs, and resold services. As is evident now over three years later, those  
13 wholesale prices did not produce broad-based competitive alternatives to Arizona citizens,  
14 because, particularly in the case of UNEs, the wholesale prices for the UNE components of many  
15 of Qwest finished services exceed the retail rates charged by Qwest, and in the case of resale, the  
16 discounts were set to low to allow many competitors to provide services with adequate margins,  
17 given the fact that competitors must pay their marketing, billing and collection and other direct  
18 costs to even resell Qwest’s services. As is evident from Qwest’s testimony in this proceeding,  
19 there are also many non-recurring charges Qwest also wants to establish, that must be factored  
20 into a business plan, when the recurring rates already produce unprofitable scenarios  
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25 Since early 1998, in addition to the various court rulings and FCC decisions that compel  
26 the establishment of prices for services not priced by this Commission in 1997, several factual  
27 developments have occurred.  
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1 For instance, ICG Communications, Inc., (which included ICG Telecom Group, Inc. – the  
2 regulated subsidiary) has filed for bankruptcy protection, apparently based upon newspaper  
3 reports, because, among other things, it relied on its interconnection agreements and previous  
4 Commission rulings regarding reciprocal compensation for ISP traffic that were modified by the  
5 Federal Communications Commission (“FCC”). GST Communications of Tucson sought  
6 protection under the bankruptcy laws.  
7

8 New players have entered the market to provide data services such as COVAD,  
9 Northpoint, RhythmsNet and JATO, who when their initial public offerings were issued, saw  
10 their stocks skyrocket in days, only to return to the ground with the rest of the technology stocks  
11 over the last year and one half, to trade in many instances at or near their all-time lows.  
12 Technology stocks in general and those on NASDAQ, specifically, have lost much of their  
13 market capitalization. Downgrades by market analysts are becoming all too common.  
14

15 The major interexchange carriers, AT&T Communications or the Mountain States, Inc.  
16 (“AT&T”), WCom, and Sprint Communications Company, who were thought to be the largest  
17 potential competitors to Qwest in 1996, did not enter the residential or small business market to  
18 any significant degree, and instead focused on serving large population centers with their own  
19 switches, rather than relying upon resale or UNEs.  
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21 In addition, with the filing of Verizon’s application for 271 approval in Massachusetts  
22 with the FCC, the Department of Justice (“DOJ”) raised concerns about pricing of UNEs in its  
23 evaluation of the Verizon application. The DOJ has opposed the application, in part, because of  
24 prices charged for UNEs. The DOJ stated: “The most plausible explanation for the limited use  
25 of the UNE-platform in Massachusetts appears to be the relatively high prices charged by  
26 Verizon for certain unbundled network elements, and there are reasons to suspect that in some  
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1 cases those prices have not been based on the relevant costs of the network elements.<sup>122</sup> Since the  
2 DOJ raised pricing issues in the Massachusetts 271 application, it would likely raise the issue in  
3 an Arizona 271 application.

4 In Massachusetts, the DOJ challenged deaveraged loop rates are \$7.54 - metro; \$14.11 -  
5 Urban; \$16.12 -Suburban; and \$20.04 - Rural. In Washington, the deaveraged loop rates for  
6 Qwest are Zone 1 - \$7.50 (5.52% of lines) (Seattle Elliott and Seattle Main); Zone 2 - \$13.89  
7 (19.65 % of lines) (Bellevue, more Seattle and two Tacoma wire centers); Zone 3 - \$ 15.73  
8 (20.62 % of lines) (more Seattle, more Tacoma, Spokane); Zone 4 - \$ 17.78 (20.65 % of lines);  
9 and Zone 5 - \$24.18 (33.36% of lines). In Minnesota, the deaveraged loop rates for Qwest are  
10 Zone 1 - \$11.84, Zone 2 - \$14.83, Zone 3 - \$16.91 and Zone 4 - \$27.96. Whereas in Arizona the  
11 interim deaveraged loop rates for Qwest are \$18.96 Metro (20% of lines), \$34.94 Suburban (59%  
12 of lines) and \$56.53 Rural (21% of lines). In addition, because the Commission adopted Qwest's  
13 proposed rates for the zones proposed by Staff, the statewide average loop rate is \$36.28, not  
14 \$21.98.<sup>2</sup>

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17 Therefore, getting the right prices has a rippling effect within the competitive  
18 environment, and the actions of this Commission on pricing, among other critical factors, will  
19 drive entry and unfortunately exit from the Arizona local exchange market. WCom is an  
20 international company that acts in a rational economic manner, and its investment dollars will be  
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23 <sup>1</sup> (DOJ Footnote) First, there has been a disparity between the prices of UNEs in Massachusetts and the  
24 prices of those same elements in the other states. While the prices of UNEs may well differ somewhat from state to  
25 state, as each state commission sets UNE prices independently, there is no obvious reason for the magnitude of the  
26 disparity between Massachusetts and other states in the Verizon region. Second, CLECs have raised several facially  
27 reasonable arguments suggesting that the UNE rates were incorrectly calculated in the MA DTE's 1996 order, the  
28 most striking of which concerns the failure to incorporate the initial switch vendor discount. *See, e.g.,* WorldCom  
Comments at 12-18. Third, in July 2000, Verizon reduced rates for UNE-platform used to serve residential lines.  
*See* Verizon Mudge Decl. Attach. A Ex. 1. We are not aware of evidence that the cost of these elements differs  
depending on whether the end user is a business customer or a residential customer, and the price differential could  
be interpreted as evidence that the UNE rates for business platform lines at that time were not cost based.

2  $18.96 \times .21 = 3.992$ ;  $34.94 \times .59 = 20.6146$ ;  $56.53 \times .21 = 11.8713$ .  $3.992 + 20.6146 + 11.8713 =$   
 $36.2779$  for statewide average loop rate.

1 spent where the best business opportunities are presented. Moreover, getting the prices right will  
2 determine whether Qwest is authorized by the FCC to enter the interLATA toll market.

3  
4 Qwest has provided a substantial list of elements that it believes should be addressed in  
5 this Phase II, but it has provided no cost studies to support the existing rates and not even a  
6 complete list of rates proposed in its SGAT. Attached as Exhibit A, is Qwest's most recent  
7 exhibit stating proposed rates for its SGAT in Arizona. The rates proposed in Exhibit A far  
8 exceed the rates proposed in the prefiled testimony.

9  
10 The Commission must review prices set in October 1997. Nearly four years have elapsed  
11 since this Commission took evidence to determine the wholesale prices for interconnection,  
12 UNEs, and resold services. For example, how could the piece parts added together exceed the  
13 rate for end-user retail service, which new entrants must compete against? The current prices  
14 have produced little competition in Arizona, and essentially none in the residential market except  
15 through cable telephony. Establishing prices for new "emerging" services, without looking at  
16 prices for existing services, is not going to turn around the competitive situation in Arizona.

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19 This Commission must examine now, after over three years of experience, the status of  
20 competition and why it has or has not met expectations. To rely on prices before there was any  
21 true competition, when the Commission now has three years of history, is to ignore reality and  
22 the factual events that have occurred since the passage of the federal Telecommunications Act of  
23 1996. Establishing rates only for "new" services will not address the fundamental problem that  
24 Arizona has experienced - the absence of significant or effective competitive entry into the local  
25 exchange market, particularly the residential market.

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28 If the State of Arizona is going to truly benefit from competition in the

1 telecommunications industry; if it expects to continue the consequent economic development it  
2 has enjoyed, and the resultant booming economy, it must, as the statutes require, establish just  
3 and reasonable rates which foster and encourage competition and which do not create a barrier to  
4 entry into the local market.

5  
6 Qwest's proposed pricing is missing relevant pricing such as recurring charges for UNE-  
7 P, line conditioning, some undetermined vertical features and for bulk access to ICNAM  
8 database some of which are stated in Exhibit A but not addressed in Qwest's prefiled testimony.  
9 WCom has argued in the SGAT/271 Checklist review proceeding, Docket No. T-00000A-97-  
10 0238, that it should have access to the ICNAM database in Docket 97I-198T on a bulk basis, not  
11 only on a per query basis. Qwest's proposed price list only provides a price for access to the  
12 CNAM data on a per query basis. Until the Commission determines whether Qwest will be  
13 required to provide CLECs with access to the CNAM database on a bulk based as requested by  
14 Qwest, it is unlikely Qwest will provide a cost study to price access to the CNAM database on a  
15 bulk basis.  
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18 Therefore, WCom supports Staff request for clarification of the Procedural Order as to  
19 whether or not the Commission intended this to be an issue in Phase II of this case. WCom also  
20 supports Staff's request for Qwest to file additional testimony, and the potential need to modify  
21 the current procedural schedule.  
22

23 WCom has no objection to Staff's request that it have ability to file its testimony after the  
24 date established for other intervenors in this proceeding so that Staff may consider, in its  
25 testimony, the various proposals put forward by all parties in this case.

26 Finally, WCom requests the date to file the issues list for Phase III of this proceeding,  
27 presently due November 28, 2000, be postponed until Staff's motion for clarification and any  
28 responses filed to it are considered by the Commission. However, to preserve its concerns,

1 WCom requests that any issue this Commission decides not to address in Phase II, including  
2 reviewing existing prices and any price contained in Exhibit A, which is not addressed in  
3 Qwest's prefiled testimony be addressed in Phase III.

4 In the alternative, if it is determined that the current procedural order is being interpreted  
5 incorrectly by Staff and WCom, then WCom specifically requests that Phase II address all  
6 existing rates for interconnection, UNEs, and resold services, now that three years have elapsed  
7 since those prices were set, and local competition has not developed to the degree expected in  
8 Arizona, as discussed above. This review was clearly contemplated by the Commission upon  
9 request of a party to the consolidated arbitration proceeding. WCom, through MCImetro, a  
10 regulated subsidiary, was clearly a party the earlier proceeding.

11 WHEREFORE, WCom respectfully requests clarification of the August 21, 2000  
12 Procedural Order as discussed above, or in the alternative, a ruling that Phase II of this  
13 proceeding will address the existing rates for interconnection, UNEs, and resold services.  
14 WCom also requests that Qwest be directed to prefile testimony and cost studies addressing the  
15 current wholesale rates for interconnection, UNEs, and resold services, using as much data as  
16 possible since January 1, 1998. WCom also requests the procedural schedule be modified to  
17 allow Qwest to make this filing and to allow intervenors sufficient time to respond to Qwest's  
18 filing addressing existing rates.

19 RESPECTFULLY SUBMITTED this 27th day of November, 2000.

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By: 

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**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
<b>6.0 Resale</b>		<b>Wholesale Discount Percentage Recurring Charges</b>	<b>Wholesale Discount Percentage Nonrecurring Charges</b>
6.1 Wholesale Discount Rates			
6.1.1 Basic Exchange Residential Line Service		12%	
6.1.2 Basic Exchange Business Line Service		18%	
6.1.3 All other Qwest Telecommunications Services		18%	
6.1.4 Product Specific Nonrecurring Charge		18%	
<b>6.2 Customer Transfer Charge (CTC)</b>			
6.2.1 CTC for POTS Service, per Line			
6.2.1.1 Residence			\$5.00
6.2.1.2 Business			\$5.00
6.2.1.3 ISDN			\$5.00
6.2.2 CTC for Private Line Transport Services			
First Circuit			\$45.08 <sup>6</sup>
Additional Circuit, per circuit, same CSR			\$31.19 <sup>6</sup>
6.2.3 CTC for Advanced Communications Services, per circuit			\$50.48 <sup>6</sup>
		<b>Recurring</b>	<b>Nonrecurring</b>
<b>7.0 Interconnection</b>			
<b>7.1 Entrance Facilities</b>			
7.1.1 DS1		\$89.42	\$256.87
7.1.2 DS3		\$357.16	\$256.87
<b>7.2 LIS EICT</b>			
Per DS1		\$4.28	\$256.87
Per DS3		\$14.98	\$269.78
		<b>Recurring Fixed</b>	<b>Recurring Per Mile</b>
<b>7.3 Direct Trunked Transport</b>			<b>Nonrecurring</b>
7.3.1 DS1 Over 0 to 8 Miles	\$35.98	\$0.65	
DS1 Over 8 to 25 Miles	\$35.99	\$0.94	
DS1 Over 25 to 50 Miles	\$36.00	\$1.75	
DS1 Over 50 Miles	\$36.00	\$1.57	
7.3.2 DS3 Over 0 to 8 Miles	\$243.17	\$13.32	
DS3 Over 8 to 25 Miles	\$246.16	\$15.90	
DS3 Over 25 to 50 Miles	\$250.66	\$22.91	
DS3 Over 50 Miles	\$249.26	\$22.49	
		<b>Recurring</b>	<b>Nonrecurring</b>
<b>7.4 Multiplexing</b>			
7.4.1 DS3 to DS1		\$196.85	\$164.00
<b>7.5 Trunk Nonrecurring Charges</b>			
7.5.1 DS1 Interface, First Trunk			\$323.03 <sup>1</sup>
7.5.2 DS1 Interface, Each Additional Trunk			\$10.21 <sup>1</sup>
7.5.3 DS3 Interface, First Trunk			\$331.71 <sup>1</sup>
7.5.4 DS3 Interface, Each Additional Trunk			\$18.27 <sup>1</sup>
<b>7.6 Local Traffic</b>			
7.6.1 End office call termination, per minute of use		\$0.002800	
7.6.2 Tandem Switched Transport			
7.6.2.1 Tandem Switching, per Minute of Use		\$0.001400	

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
7.6.2.2	Tandem Transmission, per Minute of Use, All Mileage Bands	\$0.000880	
<b>7.7 Miscellaneous Charges</b>			
7.7.1	Cancellation Charge (LIS Trunks)	U S WEST's Arizona Switched Section 5.2.3	Access Tariff
7.7.2	Expedite Charge (LIS Trunks)	U S WEST's Arizona Switched Section 5.2.2.D	Access Tariff
7.7.3	Construction Charges	ICB <sup>3</sup>	ICB <sup>3</sup>
<b>7.8 IntraLATA Toll Traffic</b>			
		U S WEST's Arizona Switched	Access Tariff
<b>7.9 Transit Traffic</b>			
7.9.1	Exchange Service (EAS/Local) Transit	\$0.00932 <sup>1</sup>	
7.9.2	IntraLATA Toll	U S WEST's Arizona Switched	Access Tariff
7.9.3	Jointly Provided Switched Access	U S WEST's Arizona Switched	Access Tariff
7.9.4	Category 11 Mechanized Record Charge, per Record	\$0.00250 <sup>6</sup>	
		<b>Recurring</b>	<b>Nonrecurring</b>
<b>8.0 Collocation</b>			
<b>8.1 All Collocation</b>			
8.1.1	Quote Preparation Fee		\$1381.54
8.1.2	Entrance Facility – Element Group 1, per Fiber Pair	\$1.52	\$1184.74
8.1.3	Entrance Facility – Element Group 2		
8.1.3.1	Manhole, per Month, per Manhole	\$13.81	
8.1.3.2	Handhold, per Month, per Handhold	\$7.61	
8.1.3.3	Conduit/Innerduct POI to vault, per Foot	\$0.21	
8.1.3.4	Core drill, per Occurrence		\$181.57
8.1.3.5	Riser, vault to equipment, per Foot	\$0.24	
8.1.3.6	Fiber Optic cable, per 24., per Foot	\$0.03	
8.1.3.7	Fiber placement in conduit and riser, per Foot	\$0.83	
8.1.3.8	Copper 25 pair, per Foot	\$0.006	
8.1.3.9	Copper splicing, per Splice		\$45.64
8.1.3.10	Copper placement conduit and riser, per Foot	\$0.83	
8.1.3.11	Coax placement, per Foot	\$0.10	
8.1.4	Cable Splicing		
	Fiber - Per set-up		\$375.40
	Per fiber spliced		\$15.79
8.1.5	-48 Volt DC Power Usage, per Ampere, per Month	\$12.89	
8.1.6	-48 Volt DC Power Cable, per Foot, Per A and B Feeder		
	20 Amp Feed	\$0.21	\$59.14
	40 Amp Feed	\$0.29	\$80.69
	60 Amp Feed	\$0.35	\$95.34
	100 Amp Feed	\$0.22 <sup>1</sup>	\$133.28 <sup>1</sup>
	200 Amp Feed	\$0.35 <sup>1</sup>	\$208.78 <sup>1</sup>
	300 Amp Feed	\$0.48 <sup>1</sup>	\$288.33 <sup>1</sup>
	400 Amp Feed	\$0.62 <sup>1</sup>	\$372.89 <sup>1</sup>
8.1.7	AC Power Feed , per Watt, per Month	\$0.03	

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
8.1.7.1	AC Power Feed, per Foot, Per A & B Feeder		
	20 Amp, Single Phase	\$0.02 <sup>1</sup>	\$9.78 <sup>1</sup>
	20 Amp, Three Phase	\$0.02 <sup>1</sup>	\$11.08 <sup>1</sup>
	30 Amp, Single Phase	\$0.02 <sup>1</sup>	\$10.21 <sup>1</sup>
	30 Amp, Three Phase	\$0.02 <sup>1</sup>	\$12.38 <sup>1</sup>
	40 Amp, Single Phase	\$0.02 <sup>1</sup>	\$11.23 <sup>1</sup>
	40 Amp, Three Phase	\$0.02 <sup>1</sup>	\$13.82 <sup>1</sup>
	50 Amp, Single Phase	\$0.02 <sup>1</sup>	\$12.52 <sup>1</sup>
	50 Amp, Three Phase	\$0.03 <sup>1</sup>	\$15.74 <sup>1</sup>
	60 Amp, Single Phase	\$0.02 <sup>1</sup>	\$13.58 <sup>1</sup>
	60 Amp, Three Phase	\$0.03 <sup>1</sup>	\$17.46 <sup>1</sup>
	100 Amp, Single Phase,	\$0.03 <sup>1</sup>	\$15.78 <sup>1</sup>
	100 Amp, Three Phase	\$0.04 <sup>1</sup>	\$22.18 <sup>1</sup>
8.1.8	Inspector Labor, per half hour		
	Regular Hours Rate		\$24.49
	After Hours Rate, minimum 3 hours		\$36.24
8.1.9	Channel Regeneration		
8.1.9.1	DS1 Regeneration	\$6.30	
8.1.9.2	DS3 Regeneration	\$41.32	
8.1.10	Collocation Terminations		
8.1.10.1	Block Terminations		
	DS0	\$1.29 <sup>1</sup>	\$636.68 <sup>1</sup>
	DS1	\$0.78 <sup>1</sup>	\$465.73 <sup>1</sup>
	DS3	\$0.43 <sup>1</sup>	\$254.90 <sup>1</sup>
8.1.10.2	Per Termination		
	DS0	\$0.01 <sup>1</sup>	\$5.19 <sup>1</sup>
	DS1	\$0.02 <sup>1</sup>	\$12.29 <sup>1</sup>
	DS3	\$0.31 <sup>1</sup>	\$186.25 <sup>1</sup>
8.1.11	Security		
	Per employee, per Card	\$6.40 <sup>1</sup>	
	Central Office Security Infrastructure	ICB <sup>3</sup>	ICB <sup>3</sup>
8.1.12	Central Office Clock Synchronization		
	Synchronization – Composite Clock, per Port	\$8.32 <sup>1</sup>	
<b>8.2</b>	<b>Virtual Collocation</b>		
8.2.1	Maintenance Labor, per half hour		
	Regular Hours Rate		\$22.20
	After Hours Rate		\$31.57
8.2.2	Training Labor, per half hour		
	Regular Hours Rate		\$23.95
8.2.3	Engineering Labor, per half hour		
	Regular Hours Rate		\$24.55
	After Hours Rate		\$35.25
8.2.4	Installation Labor, per half hour		
	Regular Hours Rate		\$23.73
	After Hours Rate		\$33.20
8.2.5	Equipment Bay -recurring, per shelf	\$6.41	

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
8.2.6	Floor Space Lease, per square Foot		
	Zone 1	\$2.75	
	Zone 2	\$2.26	
	Zone 3	\$2.06	
<b>8.3 Caged and Cageless Physical Collocation</b>			
8.3.1	Space Construction	ICB <sup>3</sup>	ICB <sup>3</sup>
8.3.2	Site Preparation	ICB <sup>3</sup>	ICB <sup>3</sup>
8.3.3	Floor Space Lease, per square Foot		
	Zone 1	\$2.75	
	Zone 2	\$2.26	
	Zone 3	\$2.06	
8.3.4	Grounding		
	2/0 AWG - per Foot	\$ .1194 <sup>1</sup>	\$5.97 <sup>1</sup>
	1/0 AWG - per Foot	\$ .1763 <sup>1</sup>	\$8.82 <sup>1</sup>
	4/0 AWG - per Foot	\$ .2096 <sup>1</sup>	\$10.48 <sup>1</sup>
	350 kcmil - per Foot	\$ .3228 <sup>1</sup>	\$16.14 <sup>1</sup>
	500 kcmil - per Foot	\$ .3765 <sup>1</sup>	\$18.83 <sup>1</sup>
	750 kcmil - per Foot	\$ .4672 <sup>1</sup>	\$23.36 <sup>1</sup>
8.3.5	Humidification, per leased physical space	\$28.03	
<b>9.0 Unbundled Network Elements (UNEs)</b>			
<b>9.1 Interconnection Tie Pairs (ITP) – Per Termination</b>			
	DS0 2-wire	ICB <sup>3</sup>	ICB <sup>3</sup>
	DS0 4-wire	ICB <sup>3</sup>	ICB <sup>3</sup>
	DS1 Per each Termination	ICB <sup>3</sup>	ICB <sup>3</sup>
	DS3 Per each Termination	ICB <sup>3</sup>	ICB <sup>3</sup>
<b>9.2 Unbundled Loops</b>			
9.2.1	Analog Loops		
9.2.1.1	2-Wire Voice Grade	\$21.98	See Installation options, Section 9.2.4
9.2.1.2	4-Wire Voice Grade	\$22.90	See Installation options, Section 9.2.4
9.2.2	Non-loaded Loops		
9.2.2.1	2-wire Non-loaded Loop	\$21.98	See Installation options, Section 9.2.4 and See also Section 9.2.2.3
9.2.2.2	4-wire Non-loaded Loop	\$22.90	See Installation options, Section 9.2.4 and See also Section 9.2.2.3
9.2.2.3	Cable Unloading/Bridge Tap Removal		\$114.80 <sup>1</sup>
9.2.3	Digital Capable Loops		
9.2.3.1	Basic Rate ISDN Capable Loop	\$21.98	See Installation options, Section 9.2.4 and See also Section 9.2.2.3

## EXHIBIT A – ARIZONA RATES\*

		Recurring	Nonrecurring
9.2.3.2	DS1 Capable Loop	\$106.87 <sup>1</sup>	See Installation options, Section 9.2.5 and See also Section 9.2.2.3
9.2.3.3	DS3 Capable Loop	\$1,152.00 <sup>1</sup>	See Installation options, Section 9.2.6 and See also Section 9.2.2.3
9.2.3.4	2-Wire Extension Technology	\$6.75	
9.2.4	DS0 Loop Installation Charges		See related monthly recurring charges in Sections 9.2.1 – 9.2.3 above.
9.2.4.1	Basic Installation		
	Residence 2-wire		\$40.92
	Business - 2-wire		\$45.92
	Residence 4-wire		\$41.81
	Business 4-wire		\$46.92
9.2.4.2	Basic Installation with Performance Testing		
	First Loop		\$146.06 <sup>1</sup>
	Each Additional Loop		\$89.26 <sup>1</sup>
9.2.4.3	Coordinated Installation with Cooperative Testing		
	First Loop		\$238.09 <sup>1</sup>
	Each Additional Loop		\$197.97 <sup>1</sup>
9.2.4.4	Coordinated Installation without Cooperative Testing		
	First Loop		\$111.33
	Each Additional Analog Loop		\$94.31
9.2.5	DS1 Loop Installation Charges		See related monthly recurring charges in Sections 9.2.1 – 9.2.3 above.
9.2.5.1	Basic Installation		
	First Loop		\$149.62 <sup>1</sup>
	Each Additional Loop		\$117.63 <sup>1</sup>
9.2.5.2	Basic Installation with Performance Testing		
	First Loop		\$341.96 <sup>1</sup>
	Each Additional Loop		\$286.80 <sup>1</sup>
9.2.5.3	Coordinated Installation with Cooperative Testing		
	First Loop		\$381.19 <sup>1</sup>
	Each Additional Loop		\$325.44 <sup>1</sup>
9.2.5.4	Coordinated Installation without Cooperative Testing		
	First Loop		\$154.59
	Each Additional Analog Loop		\$122.60 <sup>1</sup>

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
9.2.6	DS3 Loop Installation Charges	See related monthly recurring charges in Sections 9.2.1 – 9.2.3 above.	
9.2.6.1	Basic Installation		
	First Loop		\$149.62 <sup>1</sup>
	Each Additional Loop		\$117.63 <sup>1</sup>
9.2.6.2	Basic Installation with Performance Testing		
	First Loop		\$341.96 <sup>1</sup>
	Each Additional Loop		\$286.80 <sup>1</sup>
9.2.6.3	Coordinated Installation with Cooperative Testing		
	First Loop		\$381.19 <sup>1</sup>
	Each Additional Loop		\$325.44 <sup>1</sup>
9.2.6.4	Coordinated Installation without Cooperative Testing		
	First Loop		\$154.59 <sup>1</sup>
	Each Additional Analog Loop		\$122.60 <sup>1</sup>
<b>9.3 Subloop</b>			
9.3.1	2 -Wire Distribution Loop	\$15.33 <sup>1</sup>	\$119.19 <sup>1</sup>
9.3.2	Installation for Each Additional 2-Wire Distribution Loop		\$54.48 <sup>1</sup>
9.3.3	DS1 Capable Feeder Loop	\$91.14 <sup>1</sup>	Under Development
9.3.4	OSS	ICB	ICB
<b>9.4 Field Connection Point</b>			
9.4.1	Feasibility Fee/Quote Preparation Fee		ICB
9.4.2	Construction Fee		ICB
<b>9.5 Line Sharing</b>			
9.5.1	Shared Loop, per Loop	\$10.00	\$71.80 <sup>1</sup>
9.5.2	OSS, per Order	\$3.13 <sup>1</sup>	
9.5.3	Engineering – Collocation Augment		ICB
9.5.4	Splitter Shelf Charge	\$4.85 <sup>1</sup>	\$2893.50 <sup>1</sup>
9.5.5	Splitter TIE Cable Connection		\$1303.65 <sup>1</sup>
9.6	Network Interface Device (NID)	\$0.58	\$30.00
		<b>Recurring Fixed</b>	<b>Recurring Per Mile</b>
<b>9.7 Unbundled Dedicated Interoffice Transport (UDIT)</b>			<b>Nonrecurring</b>
9.7.1	DS0 UDIT		Under Development
	DS0 Over 0 to 8 Miles	\$5.05	\$0.00
	DS0 Over 8 to 25 Miles	\$5.05	\$0.00
	DS0 Over 25 to 50 Miles	\$5.05	\$0.00
	DS0 Over 50 Miles	\$5.05	\$0.00
9.7.2	DS1 UDIT		\$302.91 <sup>1</sup>
	DS1 Over 0 to 8 Miles	\$35.98	\$0.65 <sup>1</sup>
	DS1 Over 8 to 25 Miles	\$35.99	\$0.94 <sup>1</sup>
	DS1 Over 25 to 50 Miles	\$36.00	\$1.75 <sup>1</sup>
	DS1 Over 50 Miles	\$36.00	\$1.55 <sup>1</sup>
9.7.3	DS3 UDIT		\$302.91 <sup>1</sup>

## EXHIBIT A – ARIZONA RATES\*

		Recurring	Nonrecurring
	DS3 Over 0 to 8 Miles	\$243.17	\$13.32
	DS3 Over 8 to 25 Miles	\$246.15	\$15.90
	DS3 Over 25 to 50 Miles	\$250.66	\$22.91
	DS3 Over 50 Miles	\$249.26	\$22.49
9.7.4	OC-3 UDIT		\$331.92 <sup>1</sup>
	OC-3 Over 0 to 8 Miles	\$762.97 <sup>1</sup>	\$209.33 <sup>1</sup>
	OC-3 Over 8 to 25 Miles	\$769.30 <sup>1</sup>	\$65.31 <sup>1</sup>
	OC-3 Over 25 to 50 Miles	\$734.99 <sup>1</sup>	\$80.18 <sup>1</sup>
	OC-3 Over 50 Miles	\$762.17 <sup>1</sup>	\$56.19 <sup>1</sup>
9.7.5	OC-12 UDIT		\$331.92 <sup>1</sup>
	OC-12 Over 0 to 8 Miles	\$1650.83 <sup>1</sup>	\$127.90 <sup>1</sup>
	OC-12 Over 8 to 25 Miles	\$1606.33 <sup>1</sup>	\$140.88 <sup>1</sup>
	OC-12 Over 25 to 50 Miles	\$1891.43 <sup>1</sup>	\$80.02 <sup>1</sup>
	OC-12 Over 50 Miles	\$1852.14 <sup>1</sup>	\$86.25 <sup>1</sup>
		Recurring	Nonrecurring
9.7.6	DS0 UDIT Low Side Channelization	\$11.55 <sup>1</sup>	
9.7.7	Multiplexing		
	DS3 to DS1	\$196.85	\$2,281.44 <sup>1</sup>
	DS1 to DS0	\$200.08	\$230.93 <sup>1</sup>
	DS1/DS0 Low Side Channelization	\$6.59 <sup>1</sup>	\$231.47 <sup>1</sup>
9.7.8	Extended Unbundled Dedicated Interoffice Transport		
	DS1 E-UDIT	\$57.21 <sup>1</sup>	\$448.36 <sup>1</sup>
	DS3 E-UDIT	\$277.61 <sup>1</sup>	\$448.36 <sup>1</sup>
	OC-3 E-UDIT	\$1022.12 <sup>1</sup>	\$448.36 <sup>1</sup>
	OC-12 E-UDIT	\$1358.64 <sup>1</sup>	\$448.36 <sup>1</sup>
9.7.9	Udit Rearrangement		
	Single Office		Under Development
	Dual Office		Under Development
<b>9.8</b>	<b>Unbundled Dark Fiber (UDF)</b>		
9.8.1	Initial Records Inquiry (IRI)		\$161.00 <sup>1</sup>
9.8.2	Mid-Point Structure Inquiry (MPSI)		\$205.28 <sup>1</sup>
9.8.3	Field Verification and Quote Preparation (FVQP)		\$1499.33 <sup>1</sup>
9.8.4	UDF-IOF Charges		
	9.8.4.1 Order Charge per PR/Route/Order		\$568.94 <sup>1</sup>
	9.8.4.2 Order Charge ea Addl. Pr./Same Route		\$248.67 <sup>1</sup>
	9.8.4.3 Termination, Fixed Per Pr./Office	\$8.54 <sup>1</sup>	
	9.8.4.4 Fiber Transport, per Mile	\$100.01 <sup>1</sup>	
	9.8.4.5 Fiber Cross-Connect Per Pr.	\$4.74 <sup>1</sup>	\$21.76 <sup>1</sup>
9.8.5	UDF-Loop Charges		
	9.8.5.1 Order Charge per Pr./Route/Order		\$568.94 <sup>1</sup>
	9.8.5.2 Order Charge each. Addl. Pr./Same Route		\$248.67 <sup>1</sup>
	9.8.5.3 Termination, Fixed Per Pr./Office	\$7.79 <sup>1</sup>	
	9.8.5.4 Termination, Fixed Per Pr./Prem	\$6.93 <sup>1</sup>	
	9.8.5.5 Fiber Transport, per Route	\$148.37 <sup>1</sup>	
	9.8.5.6 Fiber Cross-Connect Per Pr.	\$4.74 <sup>1</sup>	\$21.76 <sup>1</sup>
<b>9.9</b>	<b>Shared Transport</b>		
9.9.1	Per Minute of Use - TELRIC Based Rate	\$0.18 <sup>1</sup>	

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
9.9.2	Per Minute of Use – Market Based Rate	Under Development	
<b>9.10</b>	<b>Unbundled Customer Controlled Rearrangement Element (UCCRE)</b>		
9.10.1	DS1 Port	ICB	ICB
9.10.2	DS3 Port	ICB	ICB
9.10.3	Dial Up Access	ICB	
9.10.4	Attendant Access	ICB	
9.10.5	Virtual Ports		ICB
<b>9.11</b>	<b>Local Tandem Switching</b>		
9.11.1	DS1 Local Message Trunk Port		\$337.96 <sup>1</sup>
9.11.2	Trunk Group – First Trunk		\$278.91 <sup>1</sup>
9.11.3	Message Trunk Group – Each Additional Trunk		\$8.64 <sup>1</sup>
9.11.4	Per Minute of Use	\$0.0014	
<b>9.12</b>	<b>Local Switching</b>		
9.12.1	Local Switching - TELRIC Based Rates		
9.12.1.1	Analog Line Side Port, First Port	\$1.61	\$42.58 <sup>5</sup>
9.12.1.2	Analog Line Side Port, Each Additional	\$1.61	\$42.58 <sup>5</sup>
9.12.1.3	Vertical Features		
	Call Hold	\$0.0568 <sup>1</sup>	
	Call Transfer	\$0.2166 <sup>1</sup>	
	Three Way Calling	\$0.0963 <sup>1</sup>	
	Call Pickup	\$0.0577 <sup>1</sup>	
	Call Waiting/Cancel Call Waiting	\$0.1330 <sup>1</sup>	
	Distinctive Ringing	\$0.0797 <sup>1</sup>	
	Speed Call Long – Customer Change	\$0.0654 <sup>1</sup>	
	Station Dial Conferencing (6-way)	\$1.0508 <sup>1</sup>	
	Call Forwarding Busy Line	\$0.1386 <sup>1</sup>	
	Call Forwarding Don't Answer	\$0.1696 <sup>1</sup>	
	Call Forwarding Variable	\$0.1414 <sup>1</sup>	
	Call Forwarding Variable Remote	\$0.1128 <sup>1</sup>	
	CLASS – Call Waiting ID	\$0.0519 <sup>1</sup>	
	CLASS – Calling Name & Number	\$0.1915 <sup>1</sup>	
	CLASS – Calling Number Delivery	\$0.0808 <sup>1</sup>	
	CLASS – Calling Number Delivery –Blocking	\$0.3822 <sup>1</sup>	
	CLASS – Continuous Redial	\$0.5008 <sup>1</sup>	
	CLASS – Last Call Return	\$0.4258 <sup>1</sup>	
	CLASS – Priority Calling	\$1.0829 <sup>1</sup>	
	CLASS – Selective Call Forwarding	\$0.9206 <sup>1</sup>	
	CLASS – Selective Call Rejection	\$1.7651 <sup>1</sup>	
	CLASS – Anonymous Call Rejection	\$0.3937 <sup>1</sup>	
	Call Park (Store & Retrieve)	\$0.1289 <sup>1</sup>	
	Message Waiting Indication A/V	\$0.0662 <sup>1</sup>	
9.12.1.4	Subsequent Order Charge		\$12.75 <sup>1</sup>
9.12.1.5	Digital Line Side Port (Supporting BRI ISDN)	\$17.13 <sup>1</sup>	
9.12.1.5.1	First Port		\$277.13 <sup>1</sup>
9.12.1.5.2	Each Additional Port		\$277.13 <sup>1</sup>
9.12.1.6	Digital Trunk Ports		
9.12.1.6.1	DS1 Local Message Trunk Port		\$337.96 <sup>1</sup>
9.12.1.6.2	Message Trunk Group, First Trunk		\$278.91 <sup>1</sup>

## EXHIBIT A – ARIZONA RATES\*

		Recurring	Nonrecurring
9.12.1.6.3	Message Trunk Group, Each Additional		\$8.64 <sup>1</sup>
9.12.1.6.4	DS1 PRI ISDN Trunk Port	\$433.42 <sup>1</sup>	\$680.85 <sup>1</sup>
9.12.1.7	DS0 Analog Trunk Port	ICB <sup>3</sup>	ICB <sup>3</sup>
9.12.1.7.1	Unbundled Analog DSO Trunk Port, First Port		\$120.33 <sup>1</sup>
9.12.1.7.2	Unbundled Analog DSO Trunk Port, Each Additional		\$27.93 <sup>1</sup>
9.12.1.8	Local Usage, per Minute of Use	\$.0071 <sup>1</sup>	
<b>9.12.2 Local Switching - Market Based Rates</b>			
9.12.2.1	Analog Line Side Port, First Port	Under Development	Under Development
9.12.2.2	Each Additional Port (ordered concurrently with an unbundled loop)	Under Development	Under Development
9.12.2.3	Vertical Features		
	Call Hold	Under Development	
	Call Transfer	Under Development	
	Three Way Calling	Under Development	
	Call Pickup	Under Development	
	Call Waiting/Cancel Call Waiting	Under Development	
	Distinctive Ringing	Under Development	
	Speed Call Long – Customer Change	Under Development	
	Station Dial Conferencing (6-way)	Under Development	
	Call Forwarding Busy Line	Under Development	
	Call Forwarding Don't Answer	Under Development	
	Call Forwarding Variable	Under Development	
	Call Forwarding Variable Remote	Under Development	
	CLASS – Call Waiting ID	Under Development	
	CLASS – Calling Name & Number	Under Development	
	CLASS – Calling Number Delivery	Under Development	
	CLASS – Calling Number Delivery –Blocking	Under Development	
	CLASS – Continuous Redial	Under Development	
	CLASS – Last Call Return	Under Development	
	CLASS – Priority Calling	Under Development	
	CLASS – Selective Call Forwarding	Under Development	
	CLASS – Selective Call Rejection	Under Development	
	CLASS – Anonymous Call Rejection	Under Development	
	Call Park (Store & Retrieve)	Under Development	
	Message Waiting Indication A/V	Under Development	

## EXHIBIT A – ARIZONA RATES\*

		Recurring	Nonrecurring
9.12.2.4	Subsequent Order Charge		Under Development
9.12.2.5	Digital Line Side Port (Supporting BRI ISDN)	Under Development	
9.12.2.5.1	First Port		Under Development
9.12.2.5.2	Each Additional Port		Under Development
9.12.2.6	Digital Trunk Ports		
9.12.2.6.1	DS1 Local Message Trunk Port		Under Development
9.12.2.6.2	Message Trunk Group, First Trunk		Under Development
9.12.2.6.3	Message Trunk Group, Each Additional		Under Development
9.12.2.6.4	DS1 PRI ISDN Trunk Port		Under Development
9.12.2.7	DS0 Analog Trunk Port	ICB <sup>3</sup>	ICB <sup>3</sup>
9.12.2.7.1	Unbundled Analog DS0 Trunk Port, First Port		Under Development
9.12.2.7.2	Unbundled Analog DS0 Trunk Port, Each Additional		Under Development
9.12.2.8	Local Usage, per Minute of Use	Under Development	Under Development
<b>9.13</b>	<b>Customized Routing</b>		
9.13.1	Development of Custom Line Class Code – Directory Assistance or Operator Services Routing Only		ICB <sup>3</sup>
9.13.2	Installation Charge, per Switch – Directory Assistance or Operator Service Routing Only		ICB <sup>3</sup>
9.13.3	All Other Custom Routing	ICB <sup>3</sup>	ICB <sup>3</sup>
<b>9.14</b>	<b>Common Channel Signaling/SS7</b>		
9.14.1	CCSAC STP Port	\$425.00 <sup>1</sup>	ICB <sup>3</sup>
9.14.2	CCSAC Options Activation Charge		
9.14.2.1	Basic Translations		
	First Activation, per Order		\$107.17 <sup>1</sup>
	Each Additional Activation, per Order		\$7.32 <sup>1</sup>
9.14.2.2	CCSAC Options Database Translations		
	First Activation per Order		\$121.82 <sup>1</sup>
	Each additional Activation per Order		\$43.95 <sup>1</sup>
9.14.3	Signal Formulation, ISUP, Per Call Set-Up Request	\$0.00198 <sup>1</sup>	
9.14.4	Signal Transport, ISUP, Per Call Set-Up Request	\$0.00145 <sup>1</sup>	
9.14.5	Signal Transport, TCAP, per Data Request	\$0.00047 <sup>1</sup>	
9.14.6	Signal Switching, ISUP, Per Call Set-Up Request	\$0.00146 <sup>1</sup>	
9.14.7	Signal Switching, TCAP, Per Data Request	\$0.00048 <sup>1</sup>	
<b>9.15</b>	<b>Advanced Intelligent Network (AIN)</b>		
9.15.1	AIN Customized Services (ACS)		ICB <sup>3</sup>
9.15.2	AIN Platform Access (APA)	ICB <sup>3</sup>	ICB <sup>3</sup>
9.15.3	AIN Query Processing, per Query	ICB <sup>3</sup>	
<b>9.16</b>	<b>Line Information Database (LIDB)</b>		
9.16.1	LIDB Storage		ICB <sup>3</sup>
9.16.2	Line Validation Administration System Access (LVAS)		ICB <sup>3</sup>

## EXHIBIT A – ARIZONA RATES\*

		Recurring	Nonrecurring
9.16.2.1	LIDB Line Record Initial Load		ICB <sup>3</sup>
9.16.2.2	Mechanized Service Account Update, per Addition or Update Processed	ICB <sup>3</sup>	
9.16.2.3	Individual Line Record Audit		ICB <sup>3</sup>
9.16.2.4	Account Group Audit		ICB <sup>3</sup>
9.16.2.5	Expedited Request Charge for Manual Updates		ICB <sup>3</sup>
9.16.3	LIDB Query Service, per Query	\$0.003540	
9.16.4	Fraud Alert Notification, per Alert	ICB <sup>3</sup>	
<b>9.17</b>	<b>8XX Database Query Service</b>		
9.17.1	Basic Query, per Query	\$0.000949 <sup>1</sup>	
9.17.2	POTS Translation	\$0.000001 <sup>1</sup>	
9.17.3	Call Handling & Destination Feature	\$0.000004 <sup>1</sup>	
<b>9.18</b>	<b>ICNAM, Per Query</b>	\$0.016 <sup>1</sup>	
<b>9.19</b>	<b>Construction Charges</b>	ICB <sup>5</sup>	ICB <sup>5</sup>
<b>9.20</b>	<b>Miscellaneous Elements</b>		
	Additional Engineering – Basic		\$29.76 <sup>1</sup>
	Additional Engineering – Overtime		\$38.41 <sup>1</sup>
	Additional Labor Installation – Overtime		\$8.46 <sup>1</sup>
	Additional Labor Installation – Premium		\$16.93 <sup>1</sup>
	Additional Labor Other – Basic		\$25.97 <sup>1</sup>
	Additional Labor Other – Overtime		\$34.78 <sup>1</sup>
	Additional Labor Other – Premium		\$43.55 <sup>1</sup>
	Testing and Maintenance – Basic		\$27.58 <sup>1</sup>
	Testing and Maintenance – Overtime		\$36.90 <sup>1</sup>
	Testing and Maintenance – Premium		\$46.23 <sup>1</sup>
	Maintenance of Service – Basic		\$25.97 <sup>1</sup>
	Maintenance of Service – Overtime		\$34.76 <sup>1</sup>
	Maintenance of Service – Premium		\$43.55 <sup>1</sup>
	Additional COOP Acceptance Testing – Basic		\$27.58 <sup>1</sup>
	Additional COOP Acceptance Testing – Overtime		\$36.90 <sup>1</sup>
	Additional COOP Acceptance Testing – Premium		\$46.23 <sup>1</sup>
	NonScheduled COOP Testing - Basic		\$27.58 <sup>1</sup>
	NonScheduled COOP Testing – Overtime		\$36.90 <sup>1</sup>
	NonScheduled COOP Testing – Premium		\$46.23 <sup>1</sup>
	NonScheduled Manual Testing – Basic		\$27.58 <sup>1</sup>
	NonScheduled Manual Testing – Overtime		\$36.90 <sup>1</sup>
	NonScheduled Manual Testing – Premium		\$46.23 <sup>1</sup>
	Additional Dispatch		\$82.17 <sup>1</sup>
	Date Change		\$12.70 <sup>1</sup>
	Design Change		\$58.67 <sup>1</sup>
	Expedite Charge		ICB <sup>5</sup>
	Cancellation Charge		ICB <sup>5</sup>
<b>10.0</b>	<b>Ancillary Services</b>		
<b>10.1</b>	<b>Interim Number Portability</b>		
10.1.1	Number Ported		\$4.47
10.1.2	Additional Call Path		
10.1.3	Service Establishment, per route, per switch		\$20.65
10.1.4	Service Establishment, additional number ported or changes to existing numbers, per number ported		\$3.32
10.1.5	Coordinated Out of Hours Cut – Non Sunday/Holiday		\$59.73 per Hr. per person <sup>1</sup>

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
10.1.6	Coordinated Out of Hours Cut - <u>Sunday/Holiday</u>		\$73.74 per Hr. per person <sup>1</sup>
<b>10.2</b>	<b>Local Number Portability</b>		
10.2.1	LNP Queries	See FCC Tariff #5 <sup>4</sup>	
<b>10.3</b>	<b>911/E911</b>	No Charge	
<b>10.4</b>	<b>White Pages Directory Listings, Facility Based Providers</b>		
10.4.1	Primary Listing	No Charge	
10.4.2	Premium/Privacy Listings		General Exchange Tariff Rate, less wholesale discount
<b>10.5</b>	<b>Directory Assistance, Facility Based Providers</b>		
10.5.1	Local Directory Assistance, Per Call	\$0.375 <sup>2</sup>	
10.5.2	National Directory Assistance, per Call	\$0.415 <sup>2</sup>	
10.5.3	Call Branding, Set- Up and Recording		\$10,500.00 <sup>2</sup>
10.5.4	Loading Brand /Per Switch		\$175.00 <sup>2</sup>
10.5.5	Call Completion Link, per call	\$0.09 <sup>2</sup>	
<b>10.6</b>	<b>Directory Assistance List Information</b>		
10.6.1	Initial Database Load, per Listing	\$0.025 <sup>2</sup>	
10.6.2	Reload of Database, per Listing	\$0.020 <sup>2</sup>	
10.6.3	Daily Updates, per Listing	\$0.025 <sup>2</sup>	
10.6.4	One-time Set-Up Fee, per Hour	\$75.24 <sup>2</sup>	
10.6.5	Media Charges for File Delivery		
10.6.5.1	Electronic Transmission	\$0.002 <sup>2</sup>	
10.6.5.2	Tapes (charges only apply if this is selected as the normal delivery medium for daily updates)	\$30.00/tape	
10.6.5.3	Shipping Charges (for tape delivery)	ICB <sup>3</sup>	
<b>10.7</b>	<b>Toll and Assistance Operator Services, Facility Based Providers,</b>		
10.7.1	<b>Option A – Per Message</b>		
	Operator Handled Calling Card	\$1.45 <sup>2</sup>	
	Machine Handled Calling Card	\$0.60 <sup>2</sup>	
	Station Call	\$1.50 <sup>2</sup>	
	Person Call	\$3.50 <sup>2</sup>	
	Connect to Directory Assistance	\$0.75 <sup>2</sup>	
	Busy Line Verify, per Call	\$1.95 <sup>2</sup>	
	Busy Line Interrupt	\$2.05 <sup>2</sup>	
	Operator Assistance, per Call	\$0.50 <sup>2</sup>	
10.7.2	<b>Option B – Per Operator Work Second and Computer Handled Calls</b>		
	Operator Handled, per Operator Work Second	\$0.028 <sup>2</sup>	
	Machine Handled, per Call	\$0.25 <sup>2</sup>	
10.7.3	Call Branding, Set-Up & Recording		\$10,500 <sup>2</sup>
10.7.4	Loading Brand/Per Switch		\$175.00 <sup>2</sup>
<b>10.8</b>	<b>Access to Poles, Ducts, Conduits and Rights of Way</b>		
10.8.1	Pole Inquiry Fee, per Mile		\$114.00 <sup>1</sup>
10.8.2	Innerduct Inquiry Fee, per Mile		\$171.00 <sup>1</sup>
10.8.3	ROW Inquiry Fee		Under Development

**EXHIBIT A – ARIZONA RATES\***

		Recurring	Nonrecurring
10.8.43	Field Verification Fee, per Pole		ICB <sup>3</sup> \$5.00 <sup>5</sup>
10.8.54	Field Verification Fee, per Manhole		ICB <sup>3</sup> \$406.00 <sup>5</sup>
10.3.6	Quitclaim Preparation Fee, ROW		Under Development
10.8.75	Make-Ready Work, per Foot Innerduct		\$3.00 <sup>1</sup>
10.8.86	Pole Attachment Fee, per Foot, per Year	\$2.82 <sup>4</sup>	
10.8.97	Innerduct Occupancy Fee, per Foot, per Year	\$0.48 <sup>4</sup>	
10.8.10	Quitclaim Consideration, ROW		\$10.00 <sup>5</sup>
<b>10.9</b>	<b>Enhanced Extended Loop (EEL)</b>		
10.9.1	EEL Link		
10.9.1.1	DS0 2-Wire	\$21.98	\$310.65 <sup>1</sup>
10.9.1.2	DS0 4-Wire	\$22.90	\$310.65 <sup>1</sup>
10.9.1.3	DS1	\$106.80 <sup>1</sup>	\$361.21 <sup>1</sup>
10.9.1.4	DS3	\$1220.51 <sup>1</sup>	\$386.29 <sup>1</sup>
10.9.1.5	Nonrecurring Charge for Each Additional EEL		\$217.27 <sup>1</sup>
		<b>Recurring Fixed</b>	<b>Recurring Per Mile</b>
10.9.2	EEL Transport		<b>Nonrecurring</b>
10.9.2.1	DS0 EEL Transport		\$310.65 <sup>1</sup>
	Each Additional		\$217.27 <sup>1</sup>
	DS0 Over 0 to 8 Miles	ICB	ICB
	DS0 Over 8 to 25 Miles	ICB	ICB
	DS0 Over 25 to 50 Miles	ICB	ICB
	DS0 Over 50 Miles	ICB	ICB
10.9.2.2	DS1 EEL Transport		\$302.91 <sup>1</sup>
	DS1 Over 0 to 8 Miles	\$35.98	\$0.65
	DS1 Over 8 to 25 Miles	\$35.99	\$0.94
	DS1 Over 25 to 50 Miles	\$36.00	\$1.75
	DS1 Over 50 Miles	\$36.00	\$1.59
10.9.2.3	DS3 EEL Transport		\$302.91 <sup>1</sup>
	DS3 Over 0 to 8 Miles	\$243.17	\$13.32
	DS3 Over 8 to 25 Miles	\$246.15	\$15.90
	DS3 Over 25 to 50 Miles	\$250.66	\$22.91
	DS3 Over 50 Miles	\$249.26	\$22.49
			<b>Recurring</b>
10.9.3	Multiplexing		<b>Nonrecurring</b>
	DS3 to DS1	\$196.85	\$285.16 <sup>1</sup>
	DS1 to DS0	\$200.08	\$285.16 <sup>1</sup>
10.9.4	DS0 Channel Performance		
	DS0 Low Side Channelization	\$11.55 <sup>1</sup>	
	DS1/DS0 MUX, Low Side Channelization	\$6.59 <sup>1</sup>	
10.9.5	Concentration Capability	ICB	ICB
<b>12.0</b>	<b>Operational Support Systems</b>		
12.1	Development and Enhancements, per Order		Under Development
12.2	Ongoing Maintenance, per Order		Under Development
12.3	Daily Usage Record File, per Record		\$0.0011 <sup>6</sup>

## EXHIBIT A – ARIZONA RATES\*

	Recurring	Nonrecurring
12.4    Trouble Isolation Charge		Section 13, Qwest's Arizona Exchange and Network Services Catalog
<b>17.0    Bona Fide Request Process</b>		
17.1    Processing Fee		\$2,128.00 <sup>1</sup>

**NOTES:**

\* Unless otherwise indicated, all rates are pursuant to Arizona Corporation Commission Order Number 60635 in Cost Docket (Consolidated Arbitrations) Number U-3021-96-448, effective January 30, 1998.

- [1] Rates not addressed in Arizona Cost Docket (Consolidated Arbitrations). ( State specific TELRIC based where required.)
- [2] Market-based rates not proposed in Arizona Cost Docket (Consolidated Arbitrations).
- [3] ICB, Individual Case Basis pricing.
- [4] Rates per FCC Guidelines.
- [5] When Unbundled Loop and Switching are ordered together, the nonrecurring charge does not apply.
- [6] Regional TELRIC based where required.

**CERTIFICATE OF SERVICE**

This is to certify that I served, on this 27<sup>th</sup> day of November 2000,

**WORLDCOM'S REPSONSE TO MOTION OF COMMISSION STAFF FOR  
CLARIFICATION OF PROCEDURAL ORDER AND FOR EXTENSION OF THE  
DEADLINE FOR FILING TESTIMONY, OR IN THE ALTERNATIVE, MOTION  
TO REVIEW ALL WHOLESALE PRICES PREVIOUSLY APPROVED BY THE  
COMMISSION IN 1997, AND LIST OF ISSUES FOR PHASE III** upon all parties of  
record, via US Mail, or as otherwise indicated:

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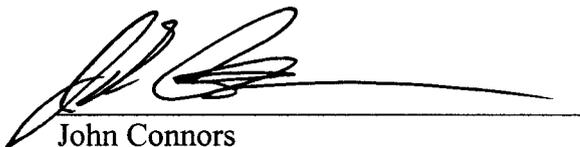
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