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**SPITZER PROPOSED AMENDMENT #AZ CORP COMMISSION DOCUMENT CONTROL**

TIME/DATE PREPARED 1:30 p.m. / December 6, 2002

COMPANY: QWEST CORPORATION

AGENDA ITEM NO. 3

DOCKET NO. T-00000A-00-0194  
Phase IIA

OPEN MEETING DATE: DECEMBER 9, 2002

**PAGE 8, LINE 19, AFTER "Qwest's proposed growth" DELETE "and fill"**

**PAGE 8, LINE 25, AFTER "With respect to fill factors, we agree that Qwest's recommendation" DELETE REMAINDER OF SENTENCE AND PARAGRAPH THROUGH PAGE 9, LINE 4**

**AND INSERT:** "reflects the actual costs an efficient carrier would incur. In this instance, as in our findings on fill factors for High Capacity Loops in our *Phase II Opinion and Order*, "the fill factors proposed by the CLECs represent even more than the 'ideal configuration neither deployed by the ILEC nor to be used by the competitor.'<sup>1</sup> We agree with Qwest that some degree of spare capacity allows an efficient carrier to meet short-term growth from additional customers, and as in our *Phase II Opinion and Order* where we adopted the HAI model's average fill factor of 48.8% for distribution plant, we believe that the FCC's Inputs Order requires us to 'recognize fills that are sized to meet current demand, including an amount of capacity to meet additional demand.'<sup>2</sup> In both our *First Cost Docket Order*<sup>3</sup> and our Phase II Opinion and Order we have recognized that Arizona is a 'high growth market'<sup>4</sup> and that growth requires an efficient allocation of spare capacity to allow efficient planning and to adapt to CLEC growth in the market. We therefore adopt Qwest's proposed fill factors for purposes of this proceeding."

Arizona Corporation Commission  
**DOCKETED**

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<sup>1</sup> ACC Decision No. 64922, (June 12, 2002) Pg. 65, Lines 26 - 27  
<sup>2</sup> Id. at Pg. 17, Lines 7 - 9  
<sup>3</sup> ACC Decision No. 60635, (January 30, 1998)  
<sup>4</sup> See, e.g., Decision No. 64922 at Page 14, Line 4

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