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Arizona Corporation Commission

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SEP 28 2001

1 WILLIAM A. MUNDELL
2 Chairman
3 JIM IRVIN
4 Commissioner
5 MARC SPITZER
6 Commissioner

DOCKETED BY

6 IN THE MATTER OF THE GENERIC
7 INVESTIGATION INTO NUMBER
8 RESOURCE OPTIMIZATION AND
9 IMPLEMENTATION OF NUMBER
10 POOLING IN ARIZONA.

Docket No. T-00000A-01-0076

**QWEST CORPORATION'S WRITTEN
COMMENTS ON ARIZONA RATE
CENTER CONSOLIDATION**

9 Qwest Corporation ("Qwest"), through its undersigned counsel, submits the following
10 comments in accordance with Arizona Corporation Commission ("Commission") Decision No.
11 63982, dated August 30, 2001.

12 **I. Qwest's List of Rate Center Consolidations.**

13 Qwest agrees to consolidate the following Qwest rate centers in accordance with Finding
14 of Fact 46. The rate center consolidations will be completed within one year, as recommended
15 by Staff.

16 New Rate Center

Current Rate Centers with Common Local Calling

17 GLOBE

Globe, Miami

18 CASA GRANDE

Casa Grande, Coolidge, Eloy, Florence, Maricopa

19 FLAGSTAFF

Flagstaff, Ash Fork, Cameron, Munds Park, Williams

20 PRESCOTT

Prescott, Chino Valley, Humboldt

21 SEDONA

Sedona, Cottonwood, Camp Verde

22 WINSLOW

Winslow, Joseph City

23 NOGALES

Nogales, Patagonia

24 YUMA

Yuma, Wellton

25 WICKENBURG

Wickenburg, Yarnell

26

1 **II. Rate Center Consolidation with Table Top (Wickenburg, Yarnell and Aguila).**

2 As stated above, Qwest agrees to consolidate the rate centers of Wickenburg and Yarnell.
3 With respect to the inclusion of Table Top territory of Aguila in the proposed rate center, Qwest
4 would not oppose joint consolidation. Qwest recommends that, in making a final decision, Staff
5 and Table Top carefully consider any future porting and pooling impact on Aguila. In addition,
6 as discussed below, the effect joint consolidation would have on 911 service should be
7 considered.

8 **III. Future Rate Center Consolidations.**

9 The current list of rate center consolidation candidates is comprised of rate centers that
10 currently share common Local Calling. There are no revenue impacts from or network facility
11 builds required for these consolidations. If the Commission and Qwest explore additional
12 consolidations, Qwest advises that substantial study and analysis of the effects on both revenue
13 and network should occur before making any decision to consolidate. Qwest's expects that any
14 similar activity involving any Qwest rate centers, beyond the scope of the current rate center
15 consolidations, will be approached by Staff, Qwest and other carriers on a case by case basis.

16 **IV. Unequal Level of Service.**

17 Future rate center consolidations may result in various switches within the newly created
18 rate center providing unequal levels of products and services. An example is the Voice
19 Messaging product. If all the switches in the rate center are not equipped with the same generic
20 version of Voice Messaging, a customer porting from one switch to another may find the same
21 service either not available at all or provided with different feature capability.

22 **V. 911 Issues.**

23 An additional factor to be considered before consolidating rate centers is the effect on 911
24 service. When a rate center consolidation involves communities that are physically located in
25 two separate counties, even though local calling already exists, there can be an effect on 911
26 database information. Qwest's evaluation of the current list of rate centers to be consolidated

1 shows that there is one rate center consolidation that crosses county boundaries, the Wickenburg,
2 Yarnell and Aguila consolidation. Wickenburg and Aguila are located in Maricopa County but
3 Yarnell is in Yavapai County. Because the Commission's order allows up to one year to
4 implement the rate center consolidations, Qwest believes there is sufficient time to make the
5 changes to the 911 database to ensure that there will be no impact to 911 service for this
6 particular consolidation. However, Qwest respectfully reminds the Commission that any time
7 future rate center consolidations are under consideration, the effects on 911 service must be taken
8 into consideration.

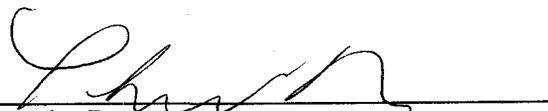
9 **V. Waivers.**

10 Consolidating rate centers creates additional multiple switch rate centers. The current
11 FCC rules regarding qualification for additional numbering resources can result in situations
12 where an individual switch may need growth resources or particular number blocks to meet a
13 customer request but may not qualify to get those resources because it is part of a multiple switch
14 rate center. In those rare instances where this may occur, Qwest supports the Commission's
15 provision of a process for filing for a waiver to acquire resources from NANPA. Any such
16 waiver will include details of the unsuccessful application process to NANPA and documentation
17 of the specific numbering inventory status and need for intervention. Qwest appreciates the
18 ACC's understanding and support of this process.

19 RESPECTFULLY SUBMITTED this 28th day of September, 2001.

20 FENNEMORE CRAIG

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2 foregoing filed this 28th day of
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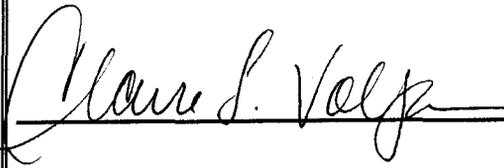
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