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ARIZONA

BEFORE THE ARIZONA CORPORATION COMMISSION

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**IN THE MATTER OF THE GENERIC  
INVESTIGATION INTO NUMBER  
RESOURCE OPTIMIZATION AND  
IMPLEMENTATION OF NUMBER  
POOLING IN ARIZONA**

DOCKET NO. T-00000A-01-0076

**AT&T'S COMMENTS ON RATE CENTER CONSOLIDATION  
RECOMMENDATIONS IN ARIZONA DECISION 63982**

AT&T Communications of the Mountain States, Inc. and TCG Phoenix (collectively "AT&T") hereby respond to the Arizona Corporation Commission's Decision No. 63982 relating to number resource optimization and the implementation of number pooling in Arizona. Specifically, AT&T is responding to ordering paragraph number 12 relating to recommendations made in Finding of Fact 46 of the Order, which relates to rate center consolidation.

Finding of Fact 46 finds that where multiple rate centers have the same local calling area, rate center consolidation should be implemented. It suggests that this be done within twelve months of the effective date of the Order. It further identifies several rate centers that would be good candidates for consolidation.

AT&T supports the concept of rate center consolidation. We believe that rate center consolidation, if implemented properly, can be an effective prospective number conservation tool. AT&T further believes that the initial parameters for rate center

consolidation in Arizona set forth in the Order -- namely limiting consolidation to rate centers within the same local calling area and implementing such consolidations within twelve months -- are prudent. AT&T suggests that the industry and Arizona regulators convene workshops in order to explore exactly where rate center consolidation would be most appropriate. Consolidating rate centers can impact various systems, processes, and rate plans in the public switched telephone network. It is important that all issues be identified and addressed before consolidation occurs. Incumbent wireline local exchange carriers will be particularly impacted. However, AT&T believes it is important that all carriers in Arizona have an opportunity to participate in the formulation of any rate center consolidation plans.

AT&T looks forward to working with the Commission on any rate center consolidation plans investigated so as to further improve the efficient use of telephone number resources in Arizona.

Respectfully submitted September 26, 2001.

AT&T COMMUNICATIONS OF  
THE MOUNTAIN STATES, INC. AND  
TCG PHOENIX

By: 

Mary B. Tribby  
Richard S. Wolters  
1875 Lawrence St., Suite 1405  
Denver, Colorado 80202  
Phone (303) 298-6741  
Fax (303) 298-6301

## CERTIFICATE OF SERVICE

I certify that the original and 10 copies of AT&T's Comments on Rate Center Consolidation Recommendations in Arizona Decision 63982 in Docket No. T-00000A-01-0076 were sent by overnight delivery on September 26, 2001 to:

Arizona Corporation Commission  
Docket Control - Utilities Division  
1200 West Washington Street  
Phoenix, AZ 85007

and a true and correct copy was sent by U. S. Mail, postage prepaid, to:

Christopher Kempley, Chief Counsel  
Arizona Corporation Commission  
Legal Division  
1200 West Washington Street  
Phoenix, AZ 85007

Steve Olea  
Acting Director - Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007

Steven H. Kukta  
Darren S. Weingard  
Sprint Communications Company, LP  
1850 Gateway Drive, 7<sup>th</sup> Floor  
San Mateo, CA 94404-2567

Thomas Campbell  
Lewis & Roca  
40 N. Central Avenue  
Phoenix, AZ 85004

Joan S. Burke  
Osborn Maledon, P. A.  
2929 N. Central Ave., 21<sup>st</sup> Floor  
P. O. Box 36379  
Phoenix, AZ 85067-6379

Thomas F. Dixon  
Karen L. Clausen  
MCI Telecommunications Corp.  
707 17<sup>th</sup> Street, #3900  
Denver, CO 80202

Stephen Gibelli  
Residential Utility Consumer Office  
2828 North Central Avenue, Suite 1200  
Phoenix, AZ 85004

Michael M. Grant  
Gallagher & Kennedy  
2600 N. Central Avenue  
Phoenix, AZ 85004-3020

Michael Patten  
Lex J. Smith  
Brown & Bain  
2901 N. Central Ave.  
Phoenix, AZ 85012

Daniel Waggoner  
Davis, Wright & Tremaine  
2600 Century Square  
1501 Fourth Avenue  
Seattle, WA 98101-1688

David Kaufman  
e.spire Communications, Inc.  
466 W. San Francisco Street  
Santa Fe, NM 87501

Carrington Phillip  
Cox Communications, Inc.  
1400 Lake Hearn Drive., N. E.  
Atlanta, GA 30319

Penny Bewick  
Electric Lightwave, Inc.  
4400 NE 77<sup>th</sup> Ave.  
Vancouver, WA 98662

W. Hagood Bellinger  
5312 Trowbridge Drive  
Dunwoody, GA 30338

Andrew O. Isar  
Telecommunication Resellers Association  
4312 92<sup>nd</sup> Ave., NW  
Gig Harbor, WA 98335

Craig Marks  
Citizens Utilities Company  
2901 North Central Avenue, Suite 1660  
Phoenix, Arizona 85012

Jim Scheltema  
Blumenfeld & Cohen  
1625 Massachusetts Ave., N. W.  
Suite 300  
Washington, DC 20036

Thomas L. Mumaw  
Snell & Wilmer  
One Arizona Center  
Phoenix, AZ 85005-0001

Alaine Miller  
NEXTLINK Communications, Inc.  
500 108<sup>th</sup> Ave. NE, Suite 2200  
Bellevue, WA 98004

Diane Bacon, Legislative Director  
Communications Workers of America  
5818 N. 7<sup>th</sup> Street, Suite 206  
Phoenix, AZ 85014-5811

Philip A. Doherty  
545 South Prospect Street, Suite 22  
Burlington, VT 05401

Joyce Hundley  
U. S. Dept. of Justice  
Antitrust Division  
1401 H Street, NW, #8000  
Washington, DC 20530

Raymond S. Heyman  
Randall H. Warner  
Two Arizona Center  
400 North 5<sup>th</sup> Street, Suite 1000  
Phoenix, AZ 85004-3906

Douglas Hsiao  
Rhythms Links, Inc.  
6933 Revere Parkway  
Englewood, CO 80112

Mark Dioguardi  
Tiffany and Bosco, PA  
500 Dial Tower  
1850 N. Central Avenue  
Phoenix, AZ 85004

Richard Smith  
Cox California Telecom, Inc.  
Two Jack London Square  
Oakland, CA 94697

Richard Rindler  
Morton J. Posner  
Swider & Berlin  
3000 K Street, NW, Suite 300  
Washington, DC 20007

Charles Kallenbach  
American Communications Services, Inc.  
131 National Business Parkway  
Annapolis Junction, Maryland

Timothy Berg  
Theresa Dwyer  
3003 North Central Avenue, Suite 2600  
Phoenix, AZ 85012-2913

*Donna R. Juch*

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