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ARIZONA CORP COMMISSION  
DOCKET CONTROL

4 **Attorneys for Defendant City of Scottsdale**

5 **BEFORE THE ARIZONA CORPORATION COMMISSION**

6  
7 Commissioners:  
Kristen K. Mayes, Chairman  
Paul Newman  
8 Gary Pierce  
Sandra D. Kennedy  
9 Bob Stump

Docket No. T-20567A-07-0662

**CITY OF SCOTTSDALE, ARIZONA'S  
OBJECTIONS TO DATA REQUESTS  
FROM STAFF**

10 IN THE MATTER OF THE  
APPLICATION OF NEWPATH  
11 NETWORKS, LLC, FOR APPROVAL  
OF A CERTIFICATE OF  
12 CONVENIENCE AND NECESSITY TO  
PROVIDE TRANSPORT AND  
13 BACKHAUL  
TELECOMMUNICATIONS SERVICES

Arizona Corporation Commission

**DOCKETED**

JUN 10 2009

DOCKETED BY

14  
15 The City of Scottsdale, an Arizona Municipal Corporation ("the City") hereby gives  
16 notice of its objection to Arizona Corporation Commission Staff's First Set of Data Requests.  
17 The City's objection is based on the fact that the City has filed with this Commission on June  
18 3, 2009 a motion to allow the City to withdraw as a party from these proceedings and a notice  
19 that the City has withdrawn its Hearing Memorandum filed with this Commission on or about  
20 April 24, 2009. In light of those circumstances, it is inappropriate and an unnecessary burden  
21 for the City to respond to the data requests from Staff. Additionally, the City's review of

1 applicable Commission rules and procedures did not reveal any mandate for an intervening  
2 party to respond to such a "data request."

3 **RESPECTFULLY SUBMITTED** this 9<sup>th</sup> day of June, 2009.

4 **SCOTTSDALE CITY ATTORNEY'S OFFICE**

5  
6 By: 

7 Deborah W. Robberson, City Attorney  
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11 Attorneys for Defendant City of Scottsdale

12 **ORIGINAL** of the foregoing filed  
13 this 9<sup>th</sup> day of June, 2009 with:

14 Arizona Corporation Administrative  
15 Law Judge Yvette B. Kinsey

16 **COPY** of the foregoing mailed this  
17 9<sup>th</sup> day of June, 2009, to:

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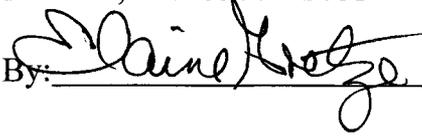
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