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BEFORE THE ARIZONA CORPORATION COMMISSION

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Arizona Corporation Commission

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AUG 10 2009

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IN THE MATTER OF THE REVIEW AND  
POSSIBLE REVISION OF ARIZONA  
UNIVERSAL SERVICE FUND RULES, ARTICLE  
12 OF THE ARIZONA ADMINISTRATIVE  
CODE.

Docket No. RT-00000H-97-0137

IN THE MATTER OF THE INVESTIGATION OF  
THE COST OF TELECOMMUNICATIONS  
ACCESS

Docket No. T-00000D-00-0672

**INTEGRA TELECOM'S RECOMMENDATION ON PROCEDURE**

At the conclusion of the July 27, 2009 workshop in this docket, Commission Staff requested parties to submit procedural recommendations for the docket by August 10, 2009. Integra Telecom, Inc. ("Integra") submits the following procedural recommendations.

Integra continues to believe that an examination of intrastate switched access rates in Arizona is premature. Although the FCC has not acted on all access charge reform issues before it, the pertinent FCC dockets remain open and should move forward, particularly given the recent confirmation of a full slate of FCC Commissioners. Given the access charge proposals currently that are still being discussed at the FCC which would impose intrastate access rates on the states, such as Missoula Intercarrier Compensation Reform Plan, CC Docket No. 01-92 and AT&T Petition for Interim Declaratory Ruling and Limited Waivers Regarding Access Charges and the "ESP Exemption", WC Docket No. 08-152, there remains a significant risk the access charge portion of this proceeding will be rendered irrelevant. Moreover, given the proposed linkage between the access charges and the AUSF, AUSF reform would also be affected by FCC action.

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1           Should the Commission decide to move forward on these issues at this time, Integra  
2 believes the Commission should consider several elements in shaping the appropriate process.  
3 There are numerous potentially affected carriers whose access charges may be reduced.  
4 Depending on the bases for potential access charge reductions, each carrier would present different  
5 facts that must be considered for any proposed reductions. It would be unwieldy and resource  
6 intensive to attempt to conduct carrier-specific proceedings at this point. To the extent the  
7 Commission moves forward, the Commission should continue with its generic process to  
8 determine the policy goals of the Commission with respect to access charges and AUSF, which  
9 should then lead to a rulemaking. The rulemaking, as has been done in other states, would address  
10 the policies identified and the issues raised in this docket. The rulemaking would reduce potential  
11 due process issues for the many carriers that have chosen not to participate in this generic docket.

12           Finally, Integra has joined in AT&T's Request for Procedural Conference or Procedural  
13 Order regarding Qwest's July 27, 2009 request to broaden these dockets by including the issue of  
14 switched access contracts. The Commission's decision on that Request will affect the procedure  
15 that would apply in these dockets. Furthermore, other parties may have suggestions for other  
16 issues that should be encompassed in this proceeding, such as the refusal of some IXCs to pay the  
17 tariffed access rates and the proper compensation for transport of wireless calls.

18                           RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of August, 2009.

19   **INTEGRA TELECOM, INC.**

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3 foregoing filed this 10<sup>th</sup> day of  
4 August 2009 with:

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