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BEFORE THE ARIZONA CORPORATION COMM.

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COMMISSIONERS

KRISTIN K. MAYES, Chairman  
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2009 SEP -9 A 9: 46  
CONF COMMISSION  
DOCKET CONTROL

Arizona Corporation Commission

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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

**ARIZONA LOCAL EXCHANGE CARRIERS ASSOCIATION  
REPLY TO QWEST MOTION TO EXPAND SCOPE  
AND PROCEDURAL RECOMMENDATION**

1 ("ALECA") hereby (i) replies to Qwest's July 27 Motion to expand the scope of these  
2 dockets to examine certain contracts, and (ii) supports AT&T's August 10, 2009, procedural  
3 recommendations in these dockets.

4 **I. REPLY TO QWEST'S JULY 27 MOTION**

5 In its Motion, Qwest asks that the Commission: "include in this investigation contracts  
6 that many CLECs have entered into with selected IXCs, providing for intrastate switched access  
7 rates that are below the tariff rates those CLECs have filed with the Commission." Qwest's  
8 Motion should be denied.

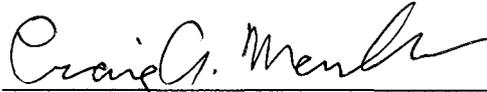
9 Qwest has provided no reason to include its requested investigation in these dockets. The  
10 above-captioned dockets relate to reforming the Arizona Universal Service Fund rules and  
11 intrastate-access charges. Qwest has shown no nexus between its request and the scope of these  
12 dockets. Further, expanding these dockets to address Qwest's new issue would delay the case,

1 which is finally moving forward after many years. Finally, Qwest would not be prejudiced by  
2 denying its Motion; it can simply file a complaint with the Commission concerning the issues.

3 **II. PROCEDURAL RECOMMENDATIONS**

4 ALECA supports AT&T's August 10, 2009, procedural recommendations in these  
5 dockets.

6 Respectfully submitted on September 9, 2009, by:

7  
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9

10 Craig A. Marks  
11 Craig A. Marks, PLC  
12 10645 N. Tatum Blvd.  
13 Suite 200-676  
14 Phoenix, AZ 85028  
15 (480) 367-1956  
16 [Craig.Marks@azbar.org](mailto:Craig.Marks@azbar.org)  
17 Attorney for Arizona Local Exchange Carriers  
18 Association  
19

20 **Original** and 15 copies **mailed**  
21 on September 9, 2009, to:

22  
23 Docket Control  
24 Arizona Corporation Commission  
25 1200 West Washington  
26 Phoenix, Arizona 85007  
27

28 **Copies** of the foregoing **mailed** on  
29 September 9, 2009, to:

30  
31 Jane L. Rodda, Administrative Law Judge  
32 Hearing Division  
33 Arizona Corporation Commission  
34 400 W. Congress Ave, Ste. 218  
35 Tucson, AZ 85701-1347  
36

Norm Curtright  
Qwest Corporation  
20 East Thomas Road, 16th Floor  
Phoenix, AZ 85012

Reed Peterson  
Qwest Corporation  
20 East Thomas Road, 16th Floor  
Phoenix, AZ 85012

Dennis Ahlers  
Associate General Counsel  
730 Second Avenue, Suite 900  
Minneapolis, MN 55402

Thomas Bade, President  
Arizona Dialtone, Inc.  
6115 South Kyrene Road  
Tempe, AZ 85283

Brad VanLear, President  
OrbitCom, Inc.  
1701 North Louise Avenue  
Sioux Falls, SD 57107

Greg L. Rogers  
Level 3 Communications, LLC  
1025 Eldorado Blvd.  
Broomfield, CO 80021

1 **Copies of the foregoing e-mailed on**  
2 **September 9, 2009, to:**  
3

Maureen A. Scott, Senior Staff Counsel  
Legal Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007  
[mscott@azcc.gov](mailto:mscott@azcc.gov)

Steve Olea, Director  
Utilities Division  
Arizona Corporation Commission  
1200 West Washington Street  
Phoenix, AZ 85007  
[ejohnson@acc.gov](mailto:ejohnson@acc.gov)

Dan Pozefsky  
Residential Utility Consumer Office  
1110 West Washington, Suite 220  
Phoenix, AZ 85007  
[dpozefsky@azruco.com](mailto:dpozefsky@azruco.com)

Lyndall Nipps  
Vice President, Regulatory  
Time Warner Telecom  
845 Camino Sur  
Palm Springs, CA 92262  
[Lyndall.Nipps@twtelecom.com](mailto:Lyndall.Nipps@twtelecom.com)

Dan Foley  
Gregory Castle  
AT&T Nevada  
645 East Plumb Lane, B132  
P.O. Box 11010  
Reno, NV 89520  
[dan.foley@att.com](mailto:dan.foley@att.com)  
[gc1831@att.com](mailto:gc1831@att.com)

Thomas Campbell  
Michael Hallam  
Lewis and Roca, LLP  
40 North Central Avenue  
Phoenix, AZ 85004  
[tcampbell@lrlaw.com](mailto:tcampbell@lrlaw.com)  
[mhallam@lrlaw.com](mailto:mhallam@lrlaw.com)  
Attorneys for Verizon

Michael Grant  
Gallagher & Kennedy  
2575 E. Camelback Road  
Phoenix, AZ 85016  
[mmg@gknet.com](mailto:mmg@gknet.com)  
Attorneys for AT&T

Charles H. Carrathers, III  
General Counsel, South Central Region  
Verizon, Inc.  
HQE03H52  
600 Hidden Ridge  
Irving, TX 75015  
[chuck.carrathers@verizon.com](mailto:chuck.carrathers@verizon.com)

Michael W. Patten  
Roshka DeWulf & Patten, PLC  
One Arizona Center  
Phoenix, AZ 85004  
[mpatten@rdp-law.com](mailto:mpatten@rdp-law.com)

Arizona Payphone Association  
c/o Gary Joseph  
Sharet Communications  
4633 West Polk Street  
Phoenix, AZ 85043  
[garyj@nationalbrands.com](mailto:garyj@nationalbrands.com)

Joan S. Burke  
Osborn Maledon, PA  
2929 North Central Avenue, Suite 2 100  
Phoenix, AZ 85027  
[jburke@omlaw.com](mailto:jburke@omlaw.com)  
Attorneys for Time Warner Telecom

Nathan Glazier, Regional Manager  
Alltel Communications, Inc.  
4805 East Thistle Landing Drive  
Phoenix, AZ 85044  
[nathan.glazier@alltel.com](mailto:nathan.glazier@alltel.com)

Mark A. DiNunzio  
MS DV3- 16, Building C  
Phoenix, AZ 85027  
[Mark.dinunzio@cox.com](mailto:Mark.dinunzio@cox.com)

William A. Haas  
Deputy General Counsel  
6400 C Street SW  
Cedar Rapids, Iowa 52406  
[Bill.Haas@mcleodusa.com](mailto:Bill.Haas@mcleodusa.com)

Catherine A. Murray, Manager  
Integra Telecom, Inc.  
730 Second Avenue, Suite 900  
Minneapolis, MN 55402  
[camurray@eschelon.com](mailto:camurray@eschelon.com)

W. John Hayes, General Manager  
Table Top Telephone Company, Inc.  
600 N. Second Ave.  
Ajo, AZ 85321  
[jhayes@tabletoptelephone.com](mailto:jhayes@tabletoptelephone.com)

1  
2  
3  
4

By:   
Craig A. Marks