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BEFORE THE ARIZONA CORPORATION COMMISSION

2010 MAR 11 P 1:42

COMMISSIONERS

AZ CORP COMMISSION
DOCKET CONTROL

KRISTIN K. MAYES, Chairman
GARY PIERCE
PAUL NEWMAN
SANDRA D. KENNEDY
BOB STUMP

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

**NOTICE OF FILING ERRATA
REGARDING TESTIMONY OF
DR. ARON**

GALLAGHER & KENNEDY, P.A.
2575 E. CAMELBACK ROAD
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AT&T Communications of the Mountain States, Inc. and TCG Phoenix give notice of the filing of the attached errata sheets making minor corrections to the Direct, Reply and Rejoinder Testimonies of Dr. Debra J. Aron. The substance of Dr. Aron's testimonies is unaffected by these corrections.

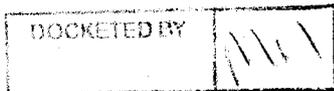
RESPECTFULLY SUBMITTED this 11th day of March, 2010.

GALLAGHER & KENNEDY, P.A.

Arizona Corporation Commission

DOCKETED

MAR 11 2010



By *Michael M Grant*

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foregoing filed this 11th day of
2 March, 2010, with:

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**ERRATA TO
DIRECT TESTIMONY OF DEBRA J. ARON ON BEHALF OF AT&T
COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND TCG PHOENIX
Docket No. RT-00000H-97-0137
Docket No. T-00000D-00-0672**

Citation	Change
Page 42, lines 5-6	For additional perspective, there are 93 separate <u>rate centers local calling areas</u> that lie within the Phoenix MTA
Page 48, footnote 49	⁴⁹ NEV. ADMIN. CODE ch. 704 § 704. <u>75295 6898</u> ; also § 704. <u>68048 68952</u> .
Page 52, lines 5-7	These states include Alaska, ⁶¹ Louisiana, ⁶² Maine, ⁶³ Maryland, ⁶⁴ Massachusetts, ⁶⁵ Missouri, ⁶⁶ New Hampshire, ⁶⁷ New Mexico, ⁶⁸ New York, ⁶⁹ Ohio, ⁷⁰ Pennsylvania, ⁷¹ Texas, ⁷² Virginia, ⁷³ and Washington. ⁷⁴
Page 52, footnote 63	⁶³ CODE ME. R. 65-407 Ch. 280 §§ 2J, 8B.
Page 52, footnote 68	⁶⁸ N.M. ADMIN. CODE at 17.11.10.8.C; at 17.11.10.7.R; and at 17.11.10.2.
Page 53, lines 1-3	In addition, some states have a policy constraining access rates that applies equally to CLECs and ILECs. Examples of such states are Maine <u>and New Mexico</u> , where all carriers are required to mirror their own interstate access rates; ⁷⁵ Connecticut, where the DPUC ordered all carriers to cap their intrastate access rates at 1.5¢ per minute; ⁷⁶ and Indiana, where intrastate access rates for all carriers are considered just and reasonable if they mirror interstate rates. ⁷⁷
Page 53, footnote 75	⁷⁵ <u>CODE ME. R. 65-407 Ch. 280 §§ 2J, 8B, and N.M. ADMIN. CODE at 17.11.10.8.C; at 17.11.10.7.R; and at 17.11.10.2.</u>
Page 59, Legend of Figure 5	Long Distance Interstate ARPM (Including Access and <u>excluding</u> Universal Service Cost)
Pages 82-83, footnote 94	⁹⁴ See, for example, Mark Armstrong, "The Theory of Access Pricing and Interconnection," in <i>Handbook of Telecommunications Economics</i> , ed. M.E. Cave et al., Vol.1, (Amsterdam: Elsevier Science B. V., 2002), pp. 356-379, and sources cited therein. In addition, some economists argue that the efficient interconnection price is zero (i.e., "bill and keep"). See, e.g., Patrick DeGraba, "Bill and Keep at the Central Office as the Efficient Interconnection Regime," Federal Communications Commission, OPP Working Paper No. 33, (Dec. 2000) ¶ <u>42</u> , n. 3 and citations in Appendix C to the <i>Inter-carrier Compensation Reform FNPRM</i> .

**ERRATA TO
REPLY TESTIMONY OF DEBRA J. ARON ON BEHALF OF AT&T
COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND TCG PHOENIX
Docket No. RT-00000H-97-0137
Docket No. T-00000D-00-0672**

Citation	Change
Page 44, lines 15-17	• Public Notice in CC Docket No. 01-92, released September 30 October 18 , 2002 (seeking comment on two petitions that request rulings regarding the intercarrier compensation regime applicable to certain types of wireless traffic)
Page 41, footnote 53	⁵³ Denney Direct Testimony, p. 41 42 .
Page 80, footnote 137	¹³⁷ <i>Johnson Direct Testimony</i> , p. 7 9 .

**ERRATA TO
REJOINDER TESTIMONY OF DEBRA J. ARON ON BEHALF OF AT&T
COMMUNICATIONS OF THE MOUNTAIN STATES, INC. AND TCG PHOENIX
Docket No. RT-00000H-97-0137
Docket No. T-00000D-00-0672**

Citation	Change
Page 21, lines 6-10	Rather than reiterate these arguments, I have prepared a table, attached as Exhibit DJA-Rejoinder 2, that lists each of the arguments in Mr. Denney's Reply Testimony and points the Commission to my response to each argument in my Direct and/or Reply testimonies (and/or, in some cases, to Dr. Oyefusi's testimony).
Page 18, footnote 15	¹⁵ Georgia (all ILECs), Indiana (major ILEC and rural ILECs), <u>Illinois (all ILECs)</u> , Kansas (all ILECs), Kentucky (major ILEC), Michigan (all ILECs), Nevada (major ILECs), Wisconsin (major ILEC), Mississippi (major ILEC), Tennessee (major ILEC), West Virginia (major ILEC), Ohio (all LECs), Texas (ILECs with over <u>3 4</u> million lines and CLECs), Maine (all LECs), New Mexico (all LECs), Massachusetts (major ILEC and CLECs), and New Jersey (all LECs).
Page 18, footnote 17	¹⁷ In addition, Mr. Price is incorrect in his characterization of the Wisconsin statute. The Wisconsin statute requires all price regulated LECs to reduce their intrastate rates to interstate levels, not just price-regulated carriers with over 150,000 lines. The statute provides a longer timeline for carriers with fewer than 150,000 lines to reduce their intrastate rates to their interstate levels, and <u>may does</u> not require those carriers to reduce their CCL all the way to zero.