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AZ CORP COMMISSION
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BEFORE THE ARIZONA CORPORATION COMMISSION

WILLIAM A. MUNDELL
Chairman

Arizona Corporation Commission
DOCKETED

JIM IRVIN
Commissioner

MAY 24 2002

MARC SPITZER
Commissioner

DOCKETED BY
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In the Matter of Qwest Corporation's
Compliance With Section 252(e) of the
Telecommunications Act of 1996

Docket No: RT-00000F-02-0271

**TIME WARNER TELECOM OF ARIZONA, LLC'S
COMMENTS ON QWEST'S AGREEMENTS**

Time Warner Telecom of Arizona, LLC ("TWTA") wishes to raise an issue for Arizona Corporation Commission and Staff consideration and evaluation. Based on its review to date of the agreements filed by Qwest in this docket (the "Agreements"), TWTA noticed that in at least one agreement Qwest granted pricing discounts to certain CLECs. These pricing discounts appear to be long-term discounts on Qwest's services and products. For example, *see* *****[redacted]. Broad price discounts for extended periods of time on services which include unbundled elements, collocation, interconnection or resale should be offered to all CLECs. Failure to do so violates the anti-discrimination provisions of the 1996 Telecommunications Act. TWTA respectfully

1 requests that the Commission and the Staff address this issue and, in particular, that the
2 Staff address this issue in its Staff Report.

3 RESPECTFULLY SUBMITTED this 24th day of May, 2002.

4 LEWIS AND ROCA LLP

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6 

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11 Attorneys for Time Warner Telecom of Arizona
12 LLC

13 ORIGINAL and ten (10) copies of
14 the foregoing hand delivered this
15 24th day of May, 2002, to:

16 The Arizona Corporation Commission
17 Docket Control – Utilities Division
18 1200 W. Washington Street
19 Phoenix, Arizona 85007

20 COPY of the foregoing hand-delivered
21 this 24th day of May, 2002, to:

22 Jane Rodda, Administrative Law Judge
23 Hearing Division
24 Arizona Corporation Commission
25 1200 W. Washington Street
26 Phoenix, Arizona 85007

Christopher Kempley, Chief Counsel
Legal Division
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1200 W. Washington Street
Phoenix, Arizona 85007

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Ernest G. Johnson, Director
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Electronically served on all parties
on the ACC Docket No: T-0000A-97-0238
Service list.

Betty J. Griffin