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ARIZONA CORPORATION COMMISSION

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MEMORANDUM

AZ CORP COMMISSION
DOCUMENT CONTROL

TO: Docket No. T-00000A-02-0271
Qwest's Compliance with Section 252(e)

FROM: Maureen A. Scott
Attorney, Legal Division

DATE: June 28, 2002

SUBJECT: Data Requests to Qwest and the CLECs in Arizona

Attached is Exhibit "A," a copy of the first set of data requests, and Exhibit "B," a copy of the second set of data requests, sent by the ACC Staff to the Competitive Local Exchange Carriers ("CLECs") in Arizona regarding Qwest's compliance with Section 252(e) of the Federal Act. Exhibit "C" contains a list of the CLECs receiving these data requests. Exhibit "D" is a copy of additional data requests which the Commission Staff sent to Qwest, as a result of the Procedural Conference on June 19, 2002.

cc: All Parties of Record

Arizona Corporation Commission
DOCKETED

JUN 28 2002

DOCKETED BY	<i>car</i>
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EXHIBIT "A"

In re the Matter of Qwest Corporation's Compliance with Section 252(e) of the
Telecommunications Act of 1996

ARIZONA CORPORATION COMMISSION STAFF'S FIRST SET OF DATA REQUESTS Docket Number RT-00000F-02-0271

- STAFF -1:1 On an ongoing basis, provide copies of all data requests received from any other parties to this proceeding and your response.
- STAFF -1:2 Have all interconnection agreements and amended interconnection agreements, or portions thereof, entered into between you and Qwest been submitted to the ACC for approval?
- STAFF -1:3 Have any interconnection agreements or amendments to interconnection agreements, or portions thereof, not been filed with the ACC for approval? If not, explain why.
- STAFF -1:4 Please provide a detailed list of all ACC approved interconnection agreements with Qwest.
- STAFF -1:5 Please submit every interconnection agreement or amended interconnection agreement, or portions thereof, with Qwest not filed with the ACC which was entered into by you.
- STAFF -1:6 Have there been any agreements not filed with the Commission between you and Qwest that either modify or augment the terms and conditions set forth in the filed and approved interconnection agreements between you and Qwest? If so, please provide a list of such agreements and a copy of them.

EXHIBIT "B"

In re the Matter of Qwest Corporation's Compliance with Section 252(e) of the
Telecommunications Act of 1996

ARIZONA CORPORATION COMMISSION STAFF'S SECOND DATA REQUESTS TO ALL CLEC INTERVENORS Docket RT-00000F-02-0271

- STAFF 2:1 Has your company, or any affiliate of your company, entered into any oral agreement[s] with Qwest which affects the rates, terms and conditions applicable to interconnection, wholesale services and/or unbundled network elements? If your response is yes, please provide a list of such oral agreements, the date entered into and the term of such contract.
- STAFF 2:2 Please provide all of the terms, conditions, and rates contained in any oral agreement which affect or affected interconnection, wholesale services and/or unbundled network elements between your company, or any affiliate of your company, and Qwest, which have not already been filed with the Arizona Corporation Commission for approval.
- STAFF 2:3 Have all oral agreements between Qwest and your company, or any affiliate of your company, which affects rates, terms and conditions applicable to interconnection wholesale services and/or unbundled network elements been filed with the Arizona Corporation Commission for approval? If your response is no, please provide a list of any such agreements not filed with the Arizona Corporation Commission, the date this agreement was entered into, and the terms of such agreement.
- STAFF 2:4 Have you had any agreements with Qwest which have since been terminated, cancelled or have expired which provided competitive advantages relative to interconnection, wholesale services or unbundled network elements to you relative to other CLECs and/or with Qwest? If so, describe and give the timeframe of each agreement.
- STAFF 2:5 Are you currently a party to any agreements with Qwest which provide a competitive advantage relative to interconnection, wholesale services and unbundled network elements relative to other CLECs and/or with Qwest?
- STAFF 2:6 Does your company, or a CLEC in general, have a shared responsibility under the Federal Act with Qwest to file interconnection agreements with the Arizona Corporation Commission for approval. If your answer is no, please explain in detail why you do not share in this responsibility and cite any relevant authority.

EXHIBIT "C"

In re the Matter of Qwest Corporation's Compliance with Section 252(e) of the
Telecommunications Act of 1996
Docket No. RT-00000F-02-0271
CLEC Data Request List¹

Adelphia Business Solutions Operations, Inc.	McLeod USA
AFN	Metropolitan Fiber Systems of Arizona, Inc.
Allegiance Telecom, Inc.	Mountain Telecommunications, Inc.
Alltell & ICG	NAS
American Communications Services, Inc.	New Edge Networks
Arizona Dial Tone, Inc.	North County Communications Corporation
AT&T	Now Communications, Inc.
AT&T and TCG	One Point Communications
Brooks Fiber Communications of Tucson, Inc.	Onfiber Carrier Services, Inc.
Caltech International Telecom Corp.	Phone Company[The]/Network Services of New Hope
Caprock Telecommunications Corp.	Quintelco, Inc.
Centurytel Solutions, LLC	Qwest Communications, Inc.
CI ² , Inc.	RCN Telecom Services, Inc.
Citizens Long Distance Company	Reflex Communications, Inc.
Comm South Companies, Inc.	Rhythm Links
Connect!	SBC Telecom, Inc.
Covad Communications Co.	Smoke Signal Communications
Cox Arizona Telecom, LLC	Sprint communications Company, L.P.
Digital Services Corporation	Staples Communications
DSLNet Communications, LLC	Talk America, Inc.
e.spire	Tel West Communications, LLC
El Paso Networks, L.L.C.	Telepacific Communications
Electric Lightwave, Inc.	Teligent Services, Inc.
Ernest Communications, Inc.	Tess Communications, Inc.
Eschelon Telecom of Arizona, Inc.	Time Warner Telecom, Inc.
Global Crossing Local Services, Inc.	Transamerican Telephone, Inc.
Gobeam Services, Inc.	TRI
GST Telecom	Universal Access of Arizona, Inc.
IG2, Inc.	Verizon Avenue
Intermedia Communications, Inc.	Verizon Select Services, Inc.
IPVoice Communications, Inc.	Vivo Communications-AZ, LLC
Jato Communications Corp.	VYVX, LLC
KMC Telecom V, Inc.	Winstar Wireless of Arizona, Inc.
Level 3 Communications, LLC	WLNI, LLC
Livewire Net	WorldCom, Inc.
Local Gateway Exchange, Inc.	XO Arizona, Inc.
Long Distance Billing Services, Inc.	Z-Tel Communications, Inc.
Looking Glass Networks, Inc.	
MCI Telecommunications Corp.	

¹ Staff has identified nine carriers who, inadvertently, have not received Data Request No. 1 listed on Exhibit A. Staff intends to send these nine requests out today. The nine carriers are: Alltell & ICG; American Communications Services, Inc.; GST Telecom; One Point Communications; The Phone Company/Network Services of New Hope; Rhythm Links; Transamerican Telephone, Inc.; Time Warner Telecom, Inc.; and TRI.

EXHIBIT "D"

In re the Matter of Qwest Corporation's Compliance with Section 252(e) of the
Telecommunications Act of 1996

ARIZONA CORPORATION COMMISSION STAFF'S FIRST SET OF DATA REQUESTS TO QWEST Docket RT-00000F-02-0271

- STAFF -1:1 Has Qwest entered into any oral agreements with another telecommunications carrier which affects or affected the rates, terms and conditions applicable to interconnection, wholesale services and/or unbundled network elements? If yes, please provide a list of such agreements, the date entered into and the term of each agreement.
- STAFF -1:2 Have all oral agreements entered into with Qwest with another telecommunications carrier which affects or affected the rates, terms and conditions applicable to interconnection, wholesale services and/or unbundled network elements been filed with the Arizona Corporation Commission ("Commission") for approval? If your response is no, please provide a list of such agreements, the date entered into and the terms of such agreements that have not been filed with the Commission for approval.
- STAFF 1:3 Please provide all of the rate, terms and conditions contained in any oral agreement which affects or affected interconnection, wholesale services and/or unbundled network elements between Qwest and any other CLEC carrier which have not already been filed with the Arizona Corporation Commission for approval.
- STAFF 1:4 Please indicate which, if any, of the unfiled agreements submitted into the record in this proceeding, have since been cancelled, terminated or have expired by their terms. Please provide a list of the agreements, the date cancelled, terminated or the date of expiration. If any agreements were cancelled or terminated prior to their natural expiration date, please discuss in detail why such agreements were cancelled or terminated.
- STAFF 1:5 Of the agreements ultimately identified by Staff as interconnection agreements which Qwest is required to file with the Commission for approval under § 252(e), does Qwest agree to submit such agreements publicly for approval pursuant to § 252(e) of the Federal Act.

STAFF 1:6 Of the agreements ultimately identified by Staff as interconnection agreements, will Qwest allow other carriers to opt into the provisions of any of these agreements if they have since been cancelled, terminated or expired. If so, what would be the term of such opt-in arrangements. If not, please identify the agreement, and its terms and conditions, and why Qwest would be unwilling to make it available.

1 Original and ten copies of the foregoing
2 were filed this 27th day of June, 2002, with:

3 Docket Control
4 Arizona Corporation Commission
5 1200 West Washington Street
6 Phoenix, AZ 85007

7 Copies of the foregoing were mailed and/or
8 hand-delivered this 27th day of June, 2002, to:

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16 QWEST Communications, Inc.
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22 Phoenix, Arizona 85016-9225

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24 Fennemore Craig
25 3003 N. Central Ave., Suite 2600
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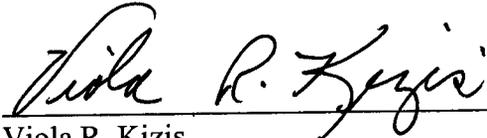
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