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BEFORE THE ARIZONA CORPORATION COMMISSION

Arizona Corporation Commission

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AZ CORP COMMISSION
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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

RUCO'S REPLY COMMENTS

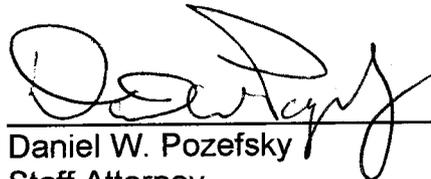
The Residential Utility Consumer Office ("RUCO"), respectfully submits these reply comments to assist in conducting the upcoming Procedural Conference.

Qwest's Comments of August 29, 2002, like the Supplemental Staff Report of August 14, 2002, focused on whether certain agreements must be filed under the Act. This ignores the real issue: disclosure of material facts to this Commission. Hiding away the facts in a form document, a settlement agreement or a tacit understanding is no excuse. The concealment perpetuated a scheme that discriminated in favor of some competitors and against others, while assuring complicity in Qwest's 271 application.

Discrimination undermines the development of competition in the local exchange market, and is exactly what the Act was designed to prevent. The Commission should not lose sight of the importance of the consequences of Qwest's and its partners' conduct by focusing merely on the form of the documents in which such partnerships were embodied. Instead, it should proceed with a hearing that broadly examines the conduct of Qwest, Eschelon and McLeodUSA.

1 This schedule will allow RUCO and other parties adequate time to complete discovery,
2 including depositions, and permit RUCO to conclude its audit of financial transactions related
3 to Qwest's agreements with McLeodUSA and Eschelon.

4 RESPECTFULLY SUBMITTED this 17th day of September 2002.

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