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BEFORE THE ARIZONA CORPORATION COMMISSION

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Commissioner

Arizona Corporation 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

WORLDCOM'S INITIAL BRIEF

WorldCom, Inc., on behalf of its regulated subsidiaries ("MCI") submits this initial brief in the above-captioned matter.

MCI has consistently requested the Commission conduct an investigation regarding Qwest's compliance with Section 252(e) of the federal Telecommunications Act of 1996. Staff of the Commission ("Staff") and the Residential Utility Consumer Office ("RUCO") conducted such an investigation. The evidence presented in this case shows that Qwest Corporation ("Qwest") failed to comply with Section 252(e). Moreover, it is apparent that the Commission should provide both adequate incentives as well as guidance to Qwest to ensure that all interconnection agreements ("ICAs") including amendments to existing ICAs for Section 251(b) and 251(c) obligations are properly and timely filed with the Commission.

Accordingly, based upon the evidence presented by Staff and RUCO, MCI requests that in addition to any penalties that the Commission may impose upon Qwest, as recommended by Staff or RUCO, that the Commission provide interim guidance for the filing of ICAs in its order in this proceeding and that the Commission subsequently open a rulemaking to establish and formally adopt 1.) an appropriate definition of an ICA, 2.) filing requirements for ICAs including a.) upon whom the obligation to file an ICA rests, b.) when such a filing is due from the party obligated to file an ICA and c.) identify generally what terms or conditions may be filed as confidential information because the information is a trade secret or otherwise proprietary including, but not limited to, customer-specific data, location or identification of facilities, usage and traffic studies or customer names and lists.

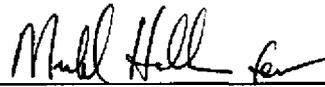
MCI strongly encourages the Commission to impose the burden to file ICAs upon Qwest as the party obligated to allow competitors to pick and choose from ICAs. ICAs should be filed by Qwest within 10 calendar days after they have been signed by relevant parties. However, the filing requirements should be minimal so that compliance is relatively easy. It should be sufficient to file the agreement, redacting any confidential material, within 10 calendar days. The filing should note the existence of confidential material and generally describe the subject matter of the confidential material so that interested parties are aware of such confidential material. When confidential material is filed, the filing should also include a request that a protective order be issued. If such a request is made, material filed as confidential should be treated as such until the material is otherwise declared to be public information. Finally, when Qwest files an ICA, it should provide notice of that filing contemporaneous with the filing to all Competitive Local Exchange Carriers ("CLECs") via its change management notification process also known as "Mailouts" provide through mailouts@qwest.com. Qwest has already

used this process to provide notice of rate changes, most recently in Docket No. T-00000A-00-0194 and this is an existing process that Qwest asserts provides broad notice to CLECs

WHEREFORE, MCI requests the Commission specifically provide interim guidance for the filing of ICAs and then open a rulemaking to formalize those procedures in addition to any penalties imposed upon Qwest.

RESPECTFULLY SUBMITTED this 1st day of May, 2003.

WORLDCOM, INC.



Thomas F. Dixon
WorldCom, Inc.
707 17th Street
Denver, Colorado 80202

ORIGINAL and thirteen (13) copies of the foregoing hand delivered this 1st day of May, 2003, to:

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

COPY of the foregoing hand-delivered this 1st day of May, 2003, to:

Jane Rodda, Administrative Law Judge
Hearing Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

Maureen Scott
Christopher Kempley
Legal Division
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, Arizona 85007

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

COPY of the foregoing mailed
this 1st day of May, 2003, to:

Scott Wakefield
Daniel Pozefsky
Residential Utility Consumer Office
1110 W. Washington Street, Ste. 220
Phoenix, Arizona 85007

Mark Dioguardi
Tiffany and Bosco PA
500 Dial Tower
1850 N. Central Avenue
Phoenix, Arizona 85004

Nigel Bates
Electric Lightwqave, Inc.
4400 NE 77th Avenue
Vancouver, Washington 98662

Charles Kallenbach
American Communications Services Inc.
131 National Business Parkway
Annapolis Junction, Maryland 20701

Richard M. Rindler
Swidler & Berlin
3000 K. Street, N.W.
Suite 300
Washington, DC 20007

Mark E. Brown
Staff Attorney – Policy and Law
Qwest
3033 N. Third Street
Room 1010
Phoenix, Arizona 85012

Jeffrey W. Crockett
Snell & Wilmer
One Arizona Center
Phoenix, Arizona 85004-0001

Eric S. Heath
Sprint Communications Company L.P.
100 Spear Street, Suite 930
San Francisco, CA 94105

Timothy Berg
Fennemore, Craig, P.C.
3003 N. Central Avenue
Suite 2600
Phoenix, Arizona 85012-3913

Qwest Corporation
Legal Department
1801 California Street, Ste. 5100
Denver, Colorado 80202

Joan S. Burke
Osborn & Maledon
2929 N. Central Avenue
21st Floor
Phoenix, Arizona 85067-6379

Richard S. Wolters
AT&T & TCG
1875 Lawrence Street
Suite 1575
Denver, Colorado 80202

Michael M. Grant
Todd C. Wiley
Gallagher & Kennedy
2575 E. Camelback Road
Phoenix, AZ 85016-4240

Raymond S. Heyman
Michael Patten
Roshka Heyman & DeWulf
Two Arizona Center
400 Fifth Street
Suite 1000
Phoenix, Arizona 85004

Mark DeNunzio
Bradley S. Carroll
Cox Communications
20402 N. 29th Avenue
Phoenix, Arizona 85027-3148

Diane Bacon, Legislative Director
Communications Workers of America
5818 North 7th Street
Suite 206
Phoenix, Arizona 85014-5811

Joyce Hundley
United States Department of Justice Antitrust Division
1401 H Street, N.W.
Suite 8000
Washington, D.C. 20530

Daniel Waggoner
Greg Kopta
Mary Steele
Davis Wright Tremaine
2600 Century Square
1501 Fourth Avenue
Seattle, Washington 98101-1688

Karen Clauson
Dennis Ahlers
Eschelon Telecom, Inc.
730 Second Avenue South
Suite 1200
Minneapolis, MN 55402

Mark P. Trinchero
Traci Grundon
Davis Wright Tremaine LLP
1300 S.W. Fifth Avenue, Suite 2300
Portland, Oregon 97201

Teresa Ono
Gregory Hoffman
AT&T
795 Folsom Street, Rm. 2159
San Francisco, CA 94107-1243

Kimberly Kirby
Davis Dixon Kirby LLP
19200 Von Karman Avenue
Suite 600
Irvine, CA 82612

Gary L. Lane, Esq.
6902 E. First Street
Suite 201
Scottsdale, Arizona 85251

Kevin Chapman
SBC Telecom, Inc.
300 Convent Street
Room 13-Q-40
San Antonio, Texas 78205

Steven J. Duffy
Ridge & Isaacson P.C.
3101 N. Central Avenue
Suite 1090
Phoenix, Arizona 85012

David Conn
McLeodUSA Incorporated
6400 C. Street S.W.
P.O. Box 3177
Cedar Rapids, IA 52406-3177

Gena Doyscher
Global Crossing Local Services, Inc.
1221 Nicollet Mall
Minneapolis, Minnesota 55403-2420

Penny Bewick
New Edge Networks, Inc.
P.O. Box 5159
Vancouver, WA 98668

Jon Loehman
Managing Director – Regulatory
5800 Northwest Parkway
Suite 135, Room I.S. 40
San Antonio, TX 78249

M. Andrew Andrade
5261 S. Quebec Street
Suite 150
Greenwood Village, CO 80111

Megan Doberneck
Harry Pliskin
Covad Communications Company
7901 Lowry Boulevard
Denver, Colorado 80230

Brian Thomas
Time Warner Telecom, Inc.
223 Taylor Avenue North
Seattle, WA 98109

ACTS
6733 E. Dale Lane
Cave Creek, Arizona 85331-6561

Andrea P. Harris
Senior Manager, Regulatory
Allegiance Telecom Inc. of Arizona
2101 Webster, Suite 1580
Oakland, CA 94612

Curt Huttzell
State Government Affairs
Electric Lightwave, Inc.
4 Triad Center
Suite 200
Salt Lake City, UT 84180

W. Hagood Bellinger
4969 Village Terrace Drive
Dunwoody, GA 30338

Richard Kolb
Vice President of Regulatory Affairs
One Point Communications
Two Conway Park
150 Field Drive
Suite 300
Lake Forest, Illinois 60045

Arizona Attorney General
Office of the Attorney General
1275 W. Washington Street
Phoenix, Arizona 85007

Rodney Joyce
Shook, Hardy & Bacon, LLP
Hamilton Square
600 14th Street NW
Suite 800
Washington, D.C. 20005-2004

Dennis Doyle
ARCH Communications Group
1800 W. Park Drive
Suite 250
Westborough, MA 01581-3912

Gerry Morrison
Map Mobile Communications, Inc.
840 Greenbrier Circle
Chesapeake, Virginia 23320

Frederick Joyce
Alston & Bird, LLP
601 Pennsylvania Avenue NW
Washington, DC 20004-2601

Metrocall, Inc.
6677 Richmond Highway
Alexandria, Virginia 22306

John E. Munger
Munger Chadwick
National Bank Plaza
333 N. Wilmot, #300
Tucson, Arizona 85711

Deborah Harwood
Integra Telecom of Arizona, Inc.
19545 NW Von Newmann Drive
Suite 200
Beaverton, Oregon 97006

Paul Masters
Ernest Communications, Inc.
6475 Jimmy Carter Boulevard
Suite 300
Norcross, Georgia 30071

Bob McCoy
William LocalNetwork, Inc.
4100 One Williams Center
Tulsa, Oklahoma 74172

Mike Allentoff
Global Crossing Services
1080 Pittsford Victor Road
Pittsford, New York 14534

Richard Sampson
Z-Tel Communications, Inc.
601 S. Harbour Island
Suite 220
Tampa, Florida 33602

A handwritten signature in cursive script, reading "Jayme Williams", is written over a horizontal line.