

WILLIAM A. MUNDELL  
CHAIRMAN  
JIM IRVIN  
COMMISSIONER  
MARC SPITZER  
COMMISSIONER



0000117614



ARIZONA CORPORATION COMMISSION

ORIGINAL  
RECEIVED

BRIAN C. McNEIL  
EXECUTIVE SECRETARY

2002 JUN -7 P 2:52

June 7, 2002

AZ CORP COMMISSION  
DOCUMENT CONTROL

TO: Telecommunications Industry Members and Other Interested Parties

RE: EAS Rulemaking Proceeding (Docket No. RT-00000J-02-0251)

The Arizona Corporation Commission ("Commission") has opened a rulemaking docket regarding Extended Area of Service ("EAS") issues in Arizona (Docket No. RT-00000J-02-0251). In the past, EAS issues were resolved in rate cases of the incumbent telecommunications service provider. However, changes in the telecommunications industry may require changes in how the Commission processes EAS filings in the future. Also, it is important that EAS cases are processed in a uniform manner. Therefore, Commission Staff would like seek comments on the attached list of questions titled Exhibit A. Staff would also like interested parties to submit any additional comments not addressed by these questions.

Based on the comments received, Staff will decide whether to first draft proposed rules or whether to ask parties to attend a workshop on EAS issues. If a workshop is desirable, Staff anticipates beginning the formal rulemaking process after the workshop is completed.

Please submit an original and ten copies of any comments to Docket Control no later than July 19, 2002, referencing Docket No. RT-00000J-02-0251. Thank you for your interest and participation in this important process.

To be placed on the formal service list in this docket please notify, in writing, Marta Kalleberg at the Commission address below. If such notification or comments are not received by July 19, 2002, you will not be placed on the formal service list and will no longer receive Commission mailings regarding this issue. If you have any questions, please feel free to contact Marta Kalleberg at 602-542-0742.

Sincerely,

Ernest Johnson  
Director, Utilities Division

cc: Chairman William A. Mundell  
Commissioner Jim Irvin  
Commissioner Marc Spitzer  
Chris Kempley, Legal Division  
Maureen Scott, Legal Division  
Marta Kalleberg, Utilities Division

Arizona Corporation Commission  
DOCKETED

JUN 07 2002

DOCKETED BY

## EXHIBIT A

1. In granting EAS, should a customer petition or other expression of public interest accompany a proposal? If so, how many customers or what percentage of customers in an area should be sufficient to prompt an EAS review?
2. Should EAS from one local calling area to two or more other local calling areas be permitted? If yes, how should the potential for illegal EAS bridging for the purpose of toll bypass be addressed and evaluated?
3. Should there be minimum call volumes needed before prompting an EAS review? If so, what should the minimum call volumes be and how would these minimum call volumes be determined in the case where multiple service providers exist?
4. Are there EAS rules in other states which should be considered or adopted in Arizona? If so, please supply these rules and any related reports or other documents.
5. How should the concept of "community of interest" be defined?
6. What is the significance of call volumes to an EAS petition and review?
7. What are the potential costs of implementing EAS and what methods should companies use to recover the cost of EAS?
8. How should the Commission approach EAS in light of the current and future competition in long distance and other telephone services? For example, how will revenue impacts on companies be determined now that the ILEC may not be the only company impacted?
9. Are there any recent developments in the telecommunications industry that should be considered by the Commission in its EAS related proceedings?
10. Are there other services that could/should be offered in place of the current form of EAS being offered?
11. Are there other factors, beyond those mentioned in previous questions, that should be considered in relation to EAS implementation?
12. How should EAS implementation be addressed in cases where the involved exchanges are owned by more than one company?
13. Rate center consolidation is a key number conservation methodology encouraged by the FCC. Should rate center consolidation also be implemented when EAS is implemented between exchanges? Provide the reasoning for your response and any supporting documentation.

14. What issues are there that should be considered when consolidating the rate centers of two or more ILECs in a local calling area?
15. What issues should be considered when consolidating the rate centers in a local calling area when both rural and non-rural carriers are involved?
16. Are there rate center consolidation orders or rules in other states that should be considered or adopted in Arizona? If so, please supply these rules or any related reports or other documents.
17. Identify where expansion of EAS might be considered to promote rate center consolidation and/or eliminate existing opportunities for EAS bridging. Prioritize your recommendation and provide an estimate of the cost and revenue impact to your company.

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Mr. Joe Cocke  
Senior NPA Relief Planner, Western Region  
NeuStar, Inc.  
1445 East Los Angeles Avenue, Suite 301-N  
Simi Valley, California 93065

Regulatory Contact  
Accipiter Communications  
Post Office Box 11929  
Glendale, Arizona 85318

ACSI Local Switched Services, Inc., dba e-spire  
133 National Business Parkway, Suite 100  
Annapolis Junction, Maryland 20701

Mr. Robert W. McCausland  
Allegiance Telecom of Arizona, Inc.  
1950 Stemmons Freeway, Suite 3026  
Dallas, Texas 75207-3118

Alltel Communications  
2125 East Adams Street  
Phoenix, Arizona 85034

Arch Paging, Inc.  
1800 West Park Drive, Suite 250  
Westborough, Massachusetts 01581-3926

Mr. Richard S. Wolters  
AT&T Communications of the Mountain States, Inc.  
1875 Lawrence Street, Suite 1575  
Denver, Colorado 80202

Ms. Cindy Manheim  
AT&T Wireless Services  
7277 164<sup>th</sup> Avenue North East  
Redmond, Washington 98052

Gregory Hoffman  
AT&T  
795 Folsom Street, Room 2159  
San Francisco, California 94107-1243

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Mr. John D. Love  
Brooks Fiber Communications of Tucson  
177 North Church Street  
Predidio Suites  
Tucson, Arizona 85701

Ms. Bethany M. Erwin  
Senior Counsel – Product & Policy  
McLeodUSA  
400 South Highway 169, Suite 750  
Minneapolis, Minnesota 55426

CenturyTel Service Group  
805 Broadway  
Vancouver, Washington 9860-3277

Mr. Curt Huttzell, Ph.D.  
Director, State Government Affairs  
Citizens Communications  
9672 South 700 East, Suite 101  
Sandy, Utah 84070-3555

Copper Valley Telephone, Inc.  
Post Office Box 970  
Willcox, Arizona 85644

Mr. Bradley S. Carroll  
Cox Communications  
1550 West Deer Valley Road  
Phoenix, Arizona 85027

Dobson Cellular Systems  
13439 North Broadway Extension  
Oklahoma City, Oklahoma 73114

Ms. Penny Bewick  
Electric Lightwave Inc.  
4400 North East 77<sup>th</sup> Avenue  
Vancouver, Washington 98662

Mr. Garth Morrisette  
Director, Regulatory Affairs  
Eschelon Telecom of Arizona  
730 Second Avenue South, Suite 1200  
Minneapolis, Minnesota 55402-2456

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Ms. Cathy Murray  
Manager, State Regulatory Group  
Frontier Local Services - AZ  
1221 Nicollette Mall, Suite 300  
Minneapolis, Minnesota 55403

Regulatory Contact  
Gila River Telecommunications, Inc.  
7065 West Allison  
Chandler, Arizona 85226

Mr. Gary Yaquinto  
Director, Government Affairs  
GST Net - AZ  
GST Telecom  
One Arizona Center  
400 East Van Buren, Suite 350  
Phoenix, Arizona 58004

Mr. Wayne Mark  
Handy Page  
841 West Fairmount, Suite 5  
Tempe, Arizona 85282

Regulatory Contact  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, Florida 33619-1309

Level 3 Communications  
1025 Eldorado Boulevard  
Broomfield, Colorado 80021

Mr. Thomas F. Dixon  
MCI WorldCom, Inc.  
707 17<sup>th</sup> Street, Suite 3900  
Denver, Colorado 80202

Mr. Steven J. Duffy  
Ridge & Isaacson P.C.  
3101 North Central Avenue, Suite 1090  
Phoenix, Arizona 85012-2638

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Regulatory Contact  
MetroCall, Inc.  
6910 Richmond Hwy  
Alexandria, Virginia 22306

Midvale Telephone Exchange, Inc.  
Post Office Box 7  
2205 Keithley Creek Road  
Midvale, Idaho 83645

Mr. Thomas Carter  
Mohave Wireless  
3707 Stockton Hill Road, Suite B  
Kingman, Arizona 86401

Mountain Telecommunications, Inc.  
10190 East McKellips Road  
Scottsdale, Arizona 85256

Regulatory Contact  
Nationwide Paging, Inc.  
2313 West Burbank Blvd  
Burbank, California 91506

Mr. James F. Kenefick  
Net-tel Corporation  
11921 Freedom Drive, Suite 550  
Reston, Virginia 20190

Regulatory Contact  
Network Services, L.L.C.  
525 South Douglas Street  
El Segundo, California 90245

Nextel Communications, Inc.  
2003 Edmund Halley Drive  
Reston, Virginia 20191

Mr. Todd Lesser  
North County Telecommunications  
3802 Rosencrans, Suite 485  
San Diego, California 92110

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Mr. Richard P. Kolb  
OnePoint Communications – Colorado  
Two Conway Park  
150 Field Drive, Suite 300  
Lake Forest, Illinois 60045

Regulatory Contact  
Optel (Arizona) Telecom, Inc.  
1111 West Mockingbird Lane, Suite 1000  
Dallas, Texas 75247

Mr. Jeff Webster  
Pac-West Telecomm, Inc.  
1776 March Lane, Suite 250  
Stockton, California 95207

Mr. Jeff Hayes  
Pagenet  
2525 East Camelback Road, Suite 1000  
Phoenix, Arizona 85254

Mr. Terrence Peck  
Prism Arizona Operations, LLC  
1667 K Street, NW, Suite 200  
Washington, DC 20006

Rio Virgin Telephone Company, Inc.  
Post Office Box 189  
Estacada, Oregon 97023

San Carlos Apache Telecommunications  
Post Office Box 158  
10 Tonto Street  
San Carlos, Arizona 85550

Mr. Richard Watkins  
Smith Bagley, Inc. dba Cellular One of NE Arizona  
1500 South White Mountain Road  
Show Low, Arizona 85901

South Central Utah Telephone Association, Inc.  
Post Office Box 226  
Escalante, Utah 84726

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Mr. Donald Low  
Sprint Communications, L.P.  
8140 Ward Parkway, 5E  
Kansas City, Missouri 64114

Mr. John Hayes  
Table Top Telephone Company, Inc.  
600 North Second Avenue  
Ajo, Arizona 85321

Manager External Relations  
TDS Telecom (dba Arizona Telephone, Southwestern Telephone)  
2495 North Main Street  
Post Office Box 220  
Choctaw, Oklahoma 73020-0220

Ms. Jennifer Seeger-Martin  
Teligent Services, Inc.  
8065 Leesburg Pike, Suite 400  
Vienna, Virginia 22182

Tohono O'odham Utility Authority  
Post Office Box 816  
Sells, Arizona 85634

Regulatory Contact  
Touch Tone Interactive  
5020 North 7<sup>th</sup> Street  
Phoenix, Arizona 85014

Valley Telecommunications Company  
Post Office Box 1099  
Willcox, Arizona 85644

Valley Telephone Cooperative, Inc.  
Post Office Box 970  
Willcox, Arizona 85643

Ms. Andrea Cooper  
Numbering Director  
Verizon Wireless  
2785 Mitchell Drive, MS7-1  
Walnut Creek, California 94598

Service List for – EAS Rulemaking Proceeding  
Docket No. RT-00000J-02-0251

Ms. Shirley Smith  
Voice Stream Wireless  
2601 West Broadway  
Tempe, Arizona 85282

Regulatory Contact  
Winstar Wireless of Arizona  
1577 Spring Hill Road, #600  
Vienna, Virginia 22182

Mr. Thomas Campbell  
Lewis and Roca  
40 North Central Avenue  
Phoenix, Arizona 85004-4429

Mr. Jeffrey Crockett  
Snell & Wilmer  
One Arizona Center  
Phoenix, Arizona 85001

Mr. Richard Sallquist  
Sallquist & Drummond  
2525 East Arizona Biltmore Circle, Suite 117  
Phoenix, Arizona 85016

Mr. Timothy Berg  
Fennemore Craig, P.C.  
3003 North Central Ave., Suite 2600  
Phoenix, Arizona 85012

Mr. Michael M. Grant  
Gallagher & Kennedy  
2575 East Camelback Road  
Phoenix, Arizona 85016-9225

Mr. Michael W. Patten  
Roshka Heyman & DeWulf, PLC  
One Arizona Center  
400 East Van Buren, Suite 800  
Phoenix, Arizona 85004

Mr. Thomas L. Mumaw  
Snell & Wilmer  
One Arizona Center  
400 East Van Buren  
Phoenix, Arizona 85004