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BEFORE THE ARIZONA CORPORATION COMMISSION

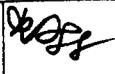
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Arizona Corporation Commission

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IN THE MATTER OF THE REVIEW AND
POSSIBLE REVISION OF ARIZONA
UNIVERSAL SERVICE FUND RULES,
ARTICLE 12 OF THE ARIZONA
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DOCKET NO. RT-00000H-97-0137

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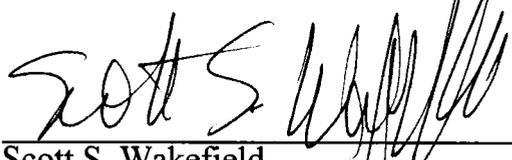
IN THE MATTER OF THE
INVESTIGATION OF THE COST OF
TELECOMMUNICATIONS ACCESS.

NOTICE OF FILING

Sprint Communications Company, L.P., Sprint Spectrum, L.P. and Nextel West Corp, hereby provides notice of filing its Reply Brief in the above-referenced matter.

Dated this 14th day of September, 2010.

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- BOB STUMP

IN THE MATTER OF THE REVIEW
 AND POSSIBLE REVISION OF
 ARIZONA UNIVERSAL SERVICE
 FUND RULES, ARTICLE 12 OF THE
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) Docket No. RT-00000H97-0137

IN THE MATTER OF THE
 INVESTIGATION OF THE COST OF
 TELECOMMUNICATIONS ACCESS.

) Docket No. T-00000D-00-0672

**SPRINT COMMUNICATIONS'
REPLY BRIEF**

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1 Sprint Communications Company L.P., Sprint Spectrum, L.P., and Nextel West
2 Corp (collectively, "Sprint"), by and through undersigned counsel, submit this Reply
3 Brief. Sprint's Initial Post-Hearing Brief thoroughly addressed many of the issues
4 raised by other parties in their initial briefs; those points will not be repeated here.

5 **I. REFORMING INTRASTATE ACCESS RATES NOW SMOOTHS THE**
6 **"GLIDE-PATH" THAT THE FCC'S NATIONAL BROADBAND PLAN**
7 **CONTEMPLATES**

8 Most parties to this proceeding support reform of access rates now at some level.
9 Only Cox and the Joint CLECs oppose the Commission moving to adjust intrastate
10 access rates. Their opposition is not to access reform *per se*, but they claim that reform
11 is premature in light of the Federal Communication Commission's ("FCC") recently
12 issued National Broadband Plan ("NBP"). The NBP set forth a path of comprehensive
13 changes to create universal availability and adoption of broadband; one aspect of that
14 all-inclusive plan is the eventual elimination of per-minute access charges. Cox and the
15 Joint CLECs advocate that the Commission wait on the FCC to move forward with its
16 comprehensive reform plan, rather than acting now.

17 Cox and the Joint CLECs draw attention to the FCC's intended purpose to phase
18 in the decreases to access charges that will eventually result in total elimination of per
19 minute access charges. Action by the Arizona Corporation Commission
20 ("Commission") to date (in approving settlements in which Qwest agreed to decrease
21 intrastate access rates in several steps) demonstrates the Commission's recognition that
22 it may be appropriate to implement access reform in steps so as to temper the possible
23 impacts of such changes.

24 Undoubtedly implementation of the comprehensive access reform contemplated
25 by the NBP will have wide-ranging impacts. The Commission can help temper the
impacts of the FCC's intended complete access reform by implementing on the

1 intrastate level the reforms that the FCC has already implemented in interstate access
2 charges. This would put Arizona at the same starting point, so that the additional
3 impacts of the FCC's forthcoming additional reform efforts will not be so large. If the
4 Commission were to adopt Cox and the Joint CLEC's "wait for the FCC to do it"
5 proposal, the impacts of the FCC's changes would be more severe than if the
6 Commission were to take steps now to further reform Qwest's, and begin reform of
7 other ILECs' and CLECs', intrastate access charges. Action now by the Commission to
8 establish intrastate access rates at interstate levels will result in smoothing out the
9 impacts of the NBP's access reform goals.

10 In determining the appropriate glide-path for access reform, the Commission
11 should recognize that the full scope of access reform goes beyond the proposals made in
12 this proceeding and includes the FCC's stated intention to eliminate all per-minute
13 access rates. While proposals of other parties may result in more tempered impacts
14 from decreases to intrastate access rates, customers and carriers would experience more
15 dramatic impacts when the FCC implements the goal of the NBP to reform of interstate
16 and intrastate access charges. The Commission can best soften the impacts of
17 comprehensive access reform by moving to the point that the FCC already has as its
18 starting point for its further planned reforms.

19 Qwest argues that the additional benefit of the Sprint/AT&T proposal (pricing
20 intrastate access at each carrier's interstate levels) relative to Qwest's proposal (pricing
21 intrastate access at Qwest's intrastate access levels) is small, and that the "additional
22 strain for ALECA members...and the increased demand on USF....counsels in favor
23 of" Qwest's proposal.¹ Staff, which like Qwest proposes that ILECs price access
24 services at the same level Qwest currently prices those services, testified that it believes

25

¹ Qwest Opening Brief at 23.

1 that ultimately, Sprint/AT&T's access pricing proposal should be adopted, but Staff's
2 concerns about gradualism hold Staff back from proposing that at this time.² Both
3 Qwest and Staff recognize that setting access charges at a carrier's interstate levels
4 provides more benefits than setting access rates at Qwest's levels – they merely have
5 concerns about the “cost” of those benefits and the rapidity at which those “costs” are
6 incurred.

7 From an economic perspective, intrastate access rates ought to be priced at or
8 below each carrier's interstate access levels. And the parties all seem to recognize that
9 the FCC is moving toward pricing all access (interstate and intrastate) at rates
10 approximating marginal cost, which is much lower than carriers' current interstate rates.
11 To temper the future impacts of the FCC proposed policy, the Commission should take
12 as large a step as possible now toward lowering access rates. Several parties
13 recognized that gradualism in rate adjustments is an important goal. The Commission
14 can create the smoothest path to access reform by taking more small steps, rather than
15 fewer, larger steps. Setting intrastate access rates at carriers' interstate levels
16 maximizes the economic benefits of access reform as quickly as possible, while
17 providing the most gradual impacts on carriers and Arizona consumers. Sprint
18 recommends a 2 to 3 year transition to move intrastate access rates to interstate levels.

19 **II. SPRINT PROPOSES THAT CLECS' INTRASTATE ACCESS RATES BE**
20 **SET AT EACH CLEC'S INTERSTATE ACCESS RATE LEVELS**

21 The Joint CLECs object to proposals that apply rates developed for one group
22 (such as ILECs) to another group (such as CLECs).³ Sprint proposes that each CLEC
23 be required to set their intrastate access rates at that CLEC's interstate access levels.

24 _____
25 ² Tr. at 668-669.

³ Joint CLECs Opening Brief at 9.

1 There is nothing unfair about apply a carriers interstate rate level to its intrastate
2 provision of the service that utilizes the same network elements.

3 **III. MARKET FORCES WILL INCENT THE PASS-THROUGH OF ACCESS**
4 **CHARGE REDUCTIONS; A REGULATORY REQUIREMENT BY THE**
5 **COMMISSION TO PASS THROUGH BENEFITS IS NOT REQUIRED**
6 **OR APPROPRIATE IN THIS COMPETITIVE ENVIRONMENT**

6 Some parties recommend that IXCs be required to pass through access charge
7 reductions that they receive.⁴ Such a proposal is based on a yesteryear view of the
8 telecommunications industry and the level of need for regulatory action. Today IXCs
9 are only a small subset of the providers offering communication services that include
10 long distance calling. Wireless, cable telephony, VoIP, etc. all offer services that
11 complete with traditional IXCs.

12 The Commission long-ago recognized that a lighter regulatory touch is
13 appropriate in a competitive market.⁵ Governmental intervention is not necessary in
14 this highly competitive market of non-local communications. AT&T witness Dr. Aron
15 aptly demonstrated that market forces do bring about price decreases to end-users when
16 access rates paid by IXCs are reduced.⁶ In addition to being unnecessary in this highly
17 competitive market of non-local communications, saddling only IXCs with follow-
18 through obligations when the Commission does not have the ability to impose
19 conditions on the other providers can skew the market.

20
21
22 ⁴ Staff Opening Brief at 15; CLEC Opening Brief at 15.

23 ⁵ For example, even before the Congress enacted the Telecommunications Act of 1996, the Commission adopted
24 rules providing for alternative, lighter regulation of customer-owned pay telephones (A.A.C. R14-2-901 *et seq.*),
25 alternative operator services (A.A.C. R14-2-1001 *et seq.*) and competitive telecommunications services (including
competitive local exchange service) (A.A.C. R14-2-1101 *et seq.*).

⁶ Exh. AT&T-1 at pg. 65-67; Exh. AT&T-3 at 55-56 (lack of need for a flow-through requirement), 86-90
(practical difficulties to enforcing a flow-through reporting requirement).

1 **IV. AFFORDABILITY BENCHMARK FOR AUSF RECOVERY**

2 ALECA recommends that if the Commission adopts Qwest's intrastate access
3 rates as the rates for other Arizona ILECs, then the Commission should establish the
4 benchmark for affordability at Qwest's local service rate. Sprint does not agree that the
5 rates for each ILEC's intrastate access service should be set at Qwest's intrastate access
6 rates (rather, Sprint proposes that they be set at each ILEC's interstate rates). However,
7 even if the Commission did set intrastate access rates at the levels of Qwest's intrastate
8 access rates, that is no reason to set the benchmark for AUSF recovery at Qwest's local
9 service rate. There is no rational connection between the concept of an affordability
10 benchmark from which universal service support is calculated and the policy of what
11 access rates should be. Affordability is measured by considerations of users' ability to
12 pay, and is not a function of the cost to provide the service. Merely because the
13 Commission might find Qwest's intrastate access rate the appropriate rate for all ILECs
14 does not mean that the Commission must find that Qwest's below-national average
15 local service rate is the appropriate benchmark against which to measure affordability of
16 local service and AUSF recovery for all Arizona ILECs.

17 Qwest's current local service rate of \$13.18 is low compared to the national
18 average basic local service rate of \$15.62.⁷ It is also far below the affordability
19 standard in many other states.⁸ For example, last month in Pennsylvania, an
20 Administrative Law Judge recommended an affordability rate of \$23.00 net of taxes and
21 other fees, and \$32.00 on a total bill basis, for analyzing the affordability of local
22 service rates that are rebalanced as a result of the proceeding to investigate intrastate
23

24 _____
25 ⁷ Exh. AT&T-7 at 56 (footnote 62).

⁸ Exh. AT&T-7 at 60.

1 access charges.⁹ Sprint's proposes an affordability benchmark of 125% of Qwest's
2 local service rate. The result of that computation, \$16.38 based on Qwest's current
3 local rate, would be very affordable, and it would remain affordable if the Qwest local
4 rate were increased to offset its access reductions to interstate rate levels.¹⁰

5 **V. ALECA'S PROPOSAL WOULD ALLOW DOUBLE-DIPPING FROM**
6 **THE AUSF**

7 ALECA proposes that ILECs take a revenue-neutral draw from the AUSF to
8 offset intrastate access reductions, and then on top of that the AUSF "complement"
9 federal USF support by providing recovery of the portion of loop costs above 115% of
10 the national average cost per loop that the federal USF program does not subsidize.¹¹
11 This proposal would allow carriers to double-dip from the AUSF. As all the parties
12 agree, access rates have historically been a method to permit local exchange carriers to
13 recover a portion of high loop costs. Therefore, if the Commission were to permit a
14 revenue-neutral draw from the AUSF for revenues lost when access rates were lowered,
15 ILECs would still be recovering the revenue previously meant to compensate the carrier
16 for high cost loops. Requiring payors into the AUSF to pay for an ILEC's double-dip
17 into the AUSF for its high loop costs would be egregiously unfair.

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23 ⁹ Recommended Decision on Remaining Issues, *Investigation Regarding Intrastate Access Charges and*
24 *IntraLATA Toll Rates of Rural Carriers and the Pennsylvania Universal Service Fund*, Docket I-00040105 (July
25 27, 2010) at 116.

¹⁰ See Exh. Sprint-3a at 12 [Confidential]; Sprint's Initial Brief at 37 (footnote 96).

¹¹ ALECA Opening Brief at 4-5.

1 **VI. AUSF RULE CHANGES ARE NOT NECESSARY TO IMPLEMENT**
2 **SPRINT'S PROPOSED ACCESS CHARGE REFORM**

3 Staff suggests that the AUSF rules need to be amended "to set forth [a] new use
4 for AUSF funds."¹² Staff acknowledges that the changes to the AUSF rules that it sees
5 as necessary are not "wholesale" revisions.¹³

6 Staff apparently sees a distinction between cost recovery as currently permitted
7 by the AUSF and recovery of costs that were previously recovered through access rates.
8 However, as the record extensively indicates, access rates were historically inflated to
9 recover a portion of the cost to provide local exchange service.¹⁴ The AUSF provides
10 for recovery of a portion of the "cost to provide basic local exchange service."¹⁵
11 Utilizing the AUSF to recover loop costs that were previously recovered through access
12 charges it not a "new use" for the AUSF that would require any change to the AUSF
13 Rules. The access charge reform advocated by Sprint would not require any
14 modification to the AUSF Rules.

15 **VII. THE JOINT CLECS' PROPOSAL TO PERMIT LECs TO RECOVER**
16 **COMPENSATION FOR INTRA-MTA TRAFFIC FROM WIRELESS**
17 **CARRIERS IS BEYOND THE SCOPE OF THIS PROCEEDING**

18 The Joint CLECs propose that the Commission should "clarify that [LECs] are
19 entitled to compensation for intraMTA traffic from wireless carriers," and set the
20 compensation rate at the rate for terminating intrastate switched access.¹⁶
21 Compensation from wireless carriers for intraMTA traffic is clearly governed by

22 ¹² Staff Opening Brief at 16.

23 ¹³ *Id.* at 18.

24 ¹⁴ See, e.g. Exh. Sprint-1 at 4-6;

25 ¹⁵ A.A.C. R14-2-1202(A).

¹⁶ Joint CLECs Initial Brief at 17.

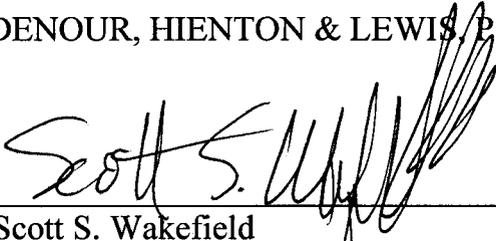
1 Section 251(a) and (b) of the Telecommunications Act of 1996, and not the access
2 charge system referred to in Section 251(g). This proceeding is addressing access rates
3 and not local interconnection charges. Accordingly, the issue raise by the Joint CLECs
4 is outside the scope of this proceeding

5 **VIII. CONCLUSION**

6 The time for access reform is at hand. The primary issue in this case is not
7 whether LECs' switched access rates should be reduced toward cost and the switched
8 access subsidy eliminated, but how closely to cost and in what timeframe. Reducing
9 intrastate access charges to interstate levels will capture greater consumer benefits than
10 merely setting rural ILEC rates at Qwest's current access levels. LECs have substantial
11 additional revenue opportunities through offering of bundled and internet services, so
12 additional AUSF subsidies should be few. The Commission should quickly institute
13 reform by ordering each LEC to mirror the rate levels and structure of its interstate
14 switched access charges.

15 DATED this 14th day of September, 2010.

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By 

Parties marked with an "" have
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