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BEFORE THE ARIZONA CORPORATION COMMISSION

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ARIZONA CORP. COMM.
HEARING DIVISION

RENZ D. JENNINGS
CHAIRMAN
MARCIA WEEKS
COMMISSIONER
CARL J. KUNASEK
COMMISSIONER

IN THE MATTER OF THE PETITION OF)
TCG PHOENIX FOR ARBITRATION)
PURSUANT TO § 252(b) OF THE)
TELECOMMUNICATIONS ACT OF 1996)
TO ESTABLISH AN)
INTERCONNECTION AGREEMENT)
WITH U S WEST COMMUNICATIONS,)
INC.)

Docket Nos. U-3016-96-402
E-1051-96-402

TCG PHOENIX'S RESPONSE AND
STATEMENT REGARDING FILING
OF INTERCONNECTION
AGREEMENT; REQUEST FOR
APPROVAL OF
INTERCONNECTION AGREEMENT

TCG Phoenix ("TCG"), through its undersigned counsel, hereby submits its separate response to U S West Communications' ("U S West") "Reservation of Rights Regarding Filing of Interconnection Agreement" filed November 29, 1996 and respectfully states:

1. TCG incorporates by reference its previous filings, briefs and memoranda herein leading up to the issuance of December No. 59873 as well as its Response to U S West's Application for Rehearing of such decision filed concurrently herewith.

2. Decision No. 59873 was and is reasonable and lawful in all respects and is in conformity with the Telecommunications Act of 1996 (the "Act") and the rules, regulations and orders of this Commission, particularly A.A.C. R.14-2-1101, et seq. (Competitive Telecommunications Rules), A.A.C. R. 14-2-1301 et seq. (Interconnection and Unbundling Rules) and A.A.C. R.14-2-1501, et seq. (Mediation and Arbitration Rules).

3. TCG understands that U S West has sought rehearing of Decision No. 59873 and presumably intends to pursue additional court proceedings if its views are not shared by the Commission.

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1 4. TCG submits that the filing made by U S West on November 29, 1996 was
2 made pursuant to Decision No. 59873 and is consistent with and authorized by such
3 Decision as well as the Act.

4 5. TCG respectfully submits that the interconnection agreement between TCG
5 and U S West should be approved as soon as reasonably possible.

6 DATED: December 9, 1996

7 Respectfully submitted,

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10 Western Region
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23 Attorneys for Petitioner TCG Phoenix

24 Original and three (3) copies
25 hand-delivered December 9, 1996, to:

26 Mr. Jerry L. Rudibaugh
Assistant Chief Hearing Officer
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Arizona 85007

PHOC 100 114

1 Copy of the foregoing hand delivered
December 9, 1996 to:

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3 Docket Control
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