

ORIGINAL



0000136884

RECEIVED

BEFORE THE ARIZONA CORPORATION COMMISSION

2012 MAY 15 P 3:39

COMMISSIONERS:

- GARY PIERCE, Chairman
- BOB STUMP
- SANDRA D. KENNEDY
- PAUL NEWMAN
- BRENDA BURNS

ARIZONA CORPORATION COMMISSION DOCKET CONTROL

DOCKETED

MAY 15 2012

DOCKETED BY [Signature]

IN THE MATTER OF THE REVIEW AND POSSIBLE REVISION OF ARIZONA UNIVERSAL SERVICE FUND RULES, ARTICLE 12 OF THE ARIZONA ADMINISTRATIVE CODE.

Docket No. RT-00000H97-0137

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

Docket No. T-00000D-00-0672

SPRINT'S COMMENTS CONCERNING THE IMPLEMENTATION OF THE FCC CONNECT AMERICAN FUND ORDER

In accordance with the directive included in the Arizona Corporation Commission's ("Commission" or "ACC") Procedural Order, issued on March 20, 2012 in the above-styled docket, Sprint Communications Company L.P., Sprint Spectrum, L.P. and Nextel West Corp. (collectively "Sprint") respectfully submits these Comments on the impact of the Federal Communications Commission's ("FCC") *Connect America Fund Order*¹ on these Arizona dockets. Sprint respectfully reserves its right to comment

¹ WC Docket No. 10-90 et al., *In the Matter of Connect America Fund, Report and Order and Further Notice of Proposed Rulemaking* (rel. Nov. 18, 2011), 26 FCC Rcd 17663, (hereinafter "CAF Order").

1 on portions of the *CAF Order* not specifically discussed below.

2 I. INTRODUCTION

3 In the long pending intercarrier compensation and universal service reform
4 proceedings, the FCC has finally taken the first steps toward disassembling the access
5 charge regime that has plagued the telecom industry since its inception in the early 1980s,
6 as well as the defunct, unilateral “calling party network pays” system which failed to
7 recognize that both called and calling parties benefit². The *CAF Order* substantially ends
8 the switched access regime by finally implementing the reciprocal compensation required
9 by the Telecommunications Act of 1996 in Section 251(b)(5). The FCC’s plan as
10 articulated in its 751-page Order is comprehensive. It addresses intercarrier
11 compensation for all types of traffic, including the intrastate switched access traffic that
12 has been the subject of this proceeding. The FCC’s access reform scheme phases down
13 intercarrier compensation rates while providing ILECs with sufficient end-user and
14 explicit funding recovery mechanisms. The *CAF Order* will ultimately benefit
15 consumers and enhance competition by eliminating the imposition of high local exchange
16 carrier intrastate switched access fees that inflate the cost of services and distort the
17 market.

18 In light of the comprehensive and controlling intercarrier compensation regime
19 articulated in the *CAF Order* and associated FCC rules, which Order and rules have not
20 been stayed in court, Sprint asserts that the most prudent action for the Arizona
21 Commission to take in light of the *CAF Order* is to perform the tasks the FCC has
22 requested of states in order to implement the *CAF Order*. The *CAF Order* states the
23 following in relation to the intercarrier compensation reforms³:

24 In particular, state oversight of the transition process is
25 necessary to ensure that carriers comply with the transition

² See *Id.*, ¶ 756: “Given the understanding that both the calling and called party benefit from a call, the “direction” of the traffic – i.e., which network is originating or terminating the call - is no longer as relevant.”

³ *Id.*, ¶813 (footnote omitted).

1 timing and intrastate access charge reductions outlined above.
2 Under our framework, rates for intrastate access traffic will
3 remain in intrastate tariffs. As a result, to ensure compliance
4 with the framework and to ensure carriers are not taking
5 actions that could enable a windfall and/or double recovery,
6 state commissions should monitor compliance with our rate
7 transition; review how carriers reduce rates to ensure
8 consistency with the uniform framework; and guard against
9 attempts to raise capped intercarrier compensation rates, as
10 well as unanticipated types of gamesmanship. Consistent
11 with states' existing authority, therefore, states could require
12 carriers to provide additional information and/or refile
13 intrastate access tariffs that do not follow the framework or
14 rules adopted in this Order. Moreover, state commissions
15 will continue to review and approve interconnection
16 agreements and associated reciprocal compensation rates to
17 ensure that they are consistent with the new federal
18 framework and transition. Thus, we will be working in
19 partnership with states to monitor carriers' compliance with
20 our rules, thereby ensuring that consumers throughout the
21 country will realize the tremendous benefits of ICC reform.

22 Accordingly, this Commission's participation in the transition process is essential in
23 order to facilitate the ICC reform outlined in the *CAF Order*.

24 II. SPRINT'S RESPONSE TO THE ISSUES RAISED BY THE 25 COMMISSION IN THE MARCH 20, 2012 PROCEDURAL ORDER

26 **Issue 1 - In light of the *CAF Order*, is there a need for the Commission to determine
27 what carriers should be covered by access reform, or a target level for intrastate
28 access charges? Does the *CAF Order* address all access charge rate elements that
29 have been addressed in these dockets? If not, should the Commission take action
30 with respect to these rate elements? Does it make sense for the Commission to act
31 on access charge reform while the *CAF Order* is on appeal, or while the FCC
32 continues to consider comments on the *Order*?**

- 1
- 2 • There is not a need for the Commission to determine what carriers should be covered
- 3 by access reform, or a target level for intrastate access charges. The FCC's *CAF*
- 4 *Order* and the associated Part 51 rules address these concerns.
- 5
- 6 • While the *CAF Order* does not directly address all access charge rate elements, the
- 7 *CAF Order* does outline the FCC's plan to continue its transition of access rate
- 8 charges as deemed necessary going-forward.
- 9
- 10 • Sprint does not believe there is a need for the Commission to take action at this time
- 11 regarding the access charge rate elements that were not directly addressed by the *CAF*
- 12 *Order*. As stated in the response to the previous question, the FCC plans to address
- 13 these access charge rate elements as deemed necessary in the future, and the ACC
- 14 should await that action.
- 15
- 16 • At this point the Commission should focus its attention on ensuring that the carriers
- 17 comply with the timing and implementation of the intrastate access charge reductions
- 18 detailed in the FCC's *CAF Order*. As discussed in our introductory remarks above,
- 19 ¶813 of the *CAF Order* anticipates the state Commissions playing a critical role in the
- 20 implementation and enforcement of the intercarrier compensation reforms required by
- 21 the FCC. In the event that the *CAF Order*'s requirements to reduce Arizona intrastate
- 22 access charges is overturned on court appeal, at that point the ACC will need to
- 23 swiftly establish its own requirements to reduce intrastate access charges in order to
- 24 secure the benefits of these reductions for Arizona's consumers and businesses.
- 25

1 **Issue 2 - Do any parties wish to modify or augment their recommendations**
2 **concerning access charge reform in light of the FCC's actions?**

3
4 The recommendations presented by Sprint in the previous filings it made in these dockets
5 are consistent with the FCC's plan of action detailed in their *CAF Order*. Therefore,
6 Sprint does not wish to modify or augment any previous recommendations at this time.

7
8 **Issue 3 – Given the *CAF Order*, does the Commission need to establish procedures to**
9 **implement intrastate access reform? And if yes, what procedures are**
10 **recommended?**

- 11
12 • In order to ensure proper implementation and enforcement of the intercarrier
13 compensation reforms required by the FCC's *CAF Order*, yes, the Commission must
14 establish procedures to implement the access reform plan.
- 15
16 • Specifically, the Commission must establish procedures pertaining to the following
17 three topics:

18
19 LEC Access Tariffs (July 1, 2012)

- 20 ○ It is essential that the ACC mandate that ILECs provide supporting data to permit
21 the Commission, Staff, and interested access payers a thorough review in advance
22 of the actual tariff filing and effective date.
- 23 ■ Supporting Data should be produced no later than May 30, 2012.
 - 24 ■ The data collected will support the FCC's role in the establishment of
25 the Access Recovery Charge (ARC) and Connect America Fund (CAF).
 - Data required:

- 1 ● Fiscal year 2011 (October 1, 2011 through September 30, 2011)
- 2 intrastate demand by element.
- 3 ● Intrastate and interstate access rates by element as of December
- 4 29, 2011.
- 5 ● If ILEC's intrastate transport rate structure is different than its
- 6 interstate transport structure,
- 7 - Must determine if ILEC will set its rate structure equal on July
- 8 1, 2012, or wait until July 1, 2013.
- 9 - Quantification of the revenues that will be generated by the new
- 10 transport rate structure when rates equal to interstate levels on
- 11 July 1, 2013.

12 Suggested Intrastate Transport Rate Restructure Methodology

- 13 ○ Calculate the total annual intrastate transport revenues under the existing rate
- 14 structure (current rates times fiscal year demand)
- 15 ○ Determine the intrastate demand for all rate elements in the new structure
- 16 ■ For MOU rate elements – the ratio of interstate local switching minutes
- 17 to interstate transport element demand applied to intrastate local
- 18 switching minutes.
- 19 ■ For dedicated transport rates – interstate demand divided by PIU; then
- 20 multiply that result by (1-PIU) to get the intrastate demand quantities.
- 21 ○ Apply the December 29, 2011 interstate rates by element to the intrastate demand
- 22 derived in the previous step. The total for all rate elements equals the revenue to
- 23 be derived from the new transport rate structure.
- 24 ○ Whether an ILEC is changing its intrastate transport rate structure on July 1, 2012,
- 25 or not, the intrastate transport rates must be reduced by the equivalent of 50% of
- the revenue difference between the existing and the future rate structures.

1
2 Competitively Neutral Rate Reductions

- 3 ○ Rate changes on July 1, 2012 should not advantage some access payers at the
4 expense of other payers.
- 5 ○ For example: if all access rate reductions are taken on minute-of-use transport
6 elements and none to dedicated transport, carriers who pay dedicated transport
7 rates will be unreasonably disadvantaged.
- 8 ○ Rate changes should be competitively neutral and lead to mirroring of interstate
9 access rates and rate structure on July 1, 2013.
- 10 ○ Interstate access rates capped by the *CAF Order* must remain capped until the rate
11 transition mandates reductions to those rates.
- 12 ▪ Price cap ILECs – originating and terminating rates.
 - 13 ▪ Rate of Return ILECs – terminating rates
- 14 ● The FCC recently released an Order⁴ setting forth the Tariff Review Plan (“TRP”) to
15 be used by incumbent local exchange carriers (“ILECs”) to support the annual access
16 rate revisions required by the *CAF Order*. It is Sprint’s belief that the TRP documents
17 filed with the FCC in conjunction with their annual access tariff filings will provide
18 the ACC with sufficient information to assist them in monitoring the rate changes
19 applicable to Arizona. While the TRP Order specifically addresses the ILECs only,
20 the TRP documents request all of the information needed to enable the Commission to
21 perform a review of CLEC rate revisions should a CLEC opt not to immediately
22 reduce their intrastate rates to the interstate levels.

23
24
25 ⁴ *Material to be Filed in Support of 2012 Annual Access Tariff Filings*, WCB/Pricing File No. 12-08, Order, DA 12-575 (Pricing Policy Division, rel. April 19, 2012) (“TRP Order”)

1 **Issue 4 – Given the *CAF Order*, does there remain a need to address the question of**
2 **whether carriers should be permitted to contract for access rates that differ from**
3 **tariff rates? If there is still a need, is the current record sufficient to resolve the**
4 **issues?**

5
6 The federal statutes requiring just and reasonable rates (Section 201) and prohibiting
7 unreasonable discrimination (Section 202) remain. In addition, the Section 252(e)(1)
8 requirement for ILECs to submit interconnection agreements and the Section
9 252(e)(2)(A) prohibition on discriminatory treatment remain.

10
11 **Issue 5 – Does the *CAF Order* impact the AUSF? Should the Commission proceed**
12 **with revisions to the AUSF rules? Why or why not? How should the AUSF be**
13 **revised? Is the current record sufficient to support any revised recommended**
14 **reforms?**

15
16 The FCC's *CAF Order* eliminates any consideration of AUSF expansion. The *CAF*
17 *Order* fully addresses the LECs contention that if access charges and revenues are
18 reduced, that the AUSF funding must be increased. Specifically, the *CAF Order* provides
19 sufficient access revenue recovery via the Access Recovery Charge ("ARC")⁵ and
20 explicit support from the Connect America Fund to the extent an ILEC's eligible
21 recovery exceeds the recovery permitted from the ARC.⁶ Further, the FCC concluded
22 that access revenue recovery from the ARC and the Connect America Fund allows the
23 LECs to earn a reasonable rate of return, and therefore established a petition process

24 ⁵ See *CAF Order*, ¶ 852.

25 ⁶ See *Id.*, ¶853.

1 through which the LECs can request additional support should they believe such relief is
2 insufficient⁷.

3
4 Given the FCC created an adequate process to address access revenue recovery, there is
5 no need for the ACC to revise the AUSF rules.

6
7 **Issue 6 – In light of the intervening events, do the interested parties have**
8 **modifications to any of their earlier recommendations about the AUSF not already**
9 **addressed? Procedurally, how should the Commission consider any revised**
10 **recommendations?**

11
12 As discussed in Sprint’s response to Issue 5 above, the FCC has already established the
13 process associated with access revenue recovery. Therefore, at this time the ACC merely
14 needs to focus on assisting the FCC with the implementation of access reform process
15 established by the *CAF Order*, and take no action pertaining to the AUSF.

16
17
18 **Issue 7 – Is there any reason why the Commission should not act now concerning**
19 **centralized administration and automatic enrollment of Lifeline and Link Up?**

20
21 Sprint does not take exception to the Commission acting upon the centralized
22 administration of Lifeline and Link Up. In particular, Sprint supports the use of public
23 benefits information⁸ to verify applicant eligibility for Lifeline and Link Up assistance,

24
25 ⁷ See *Id.*, ¶ 924.

⁸ For example; Medicaid, Food Stamps, Free National School Lunch Program.

1 and the development of a single interface through which federal and state databases could
2 be accessed. Sprint does however note that any form of centralized administration of
3 Lifeline and Link Up should conform to the rulings in FCC's *Lifeline Reform Order*.⁹

4
5 Conversely, Sprint does have concerns with the Commission implementing an automatic
6 enrollment system for Lifeline and Link Up.¹⁰ While Sprint does not oppose advising its
7 customers of their rights regarding Lifeline and Link Up qualifications and eligibility,
8 Sprint does not believe enrollment should be automatic as there are often circumstance
9 that create uncertainty and confusion. For example, suppose a customer receives their
10 wireless service from T-Mobile and their landline service from CenturyLink. Further
11 suppose that the customer wants to switch to Sprint for their wireless service, and the
12 customer meets the eligibility requirements and is entitled to the Lifeline discount. From
13 which carrier would the customer receive the Lifeline discount? Would it be Sprint as
14 the new wireless provider, or Centurylink as the landline provide? In this situation, who
15 would make that determination, and based on what criteria? This is only one example of
16 a situation that would lead to confusion and the potential for "gaming the system" should
17 the customer not be involved in the process by applying for Lifeline or Link Up service.

18
19 **Issue 8 – In light of the *CAF Order's* reference to the role of states in the**
20 **implementation of the reforms addressed in that Order, should the Commission**
21 **take further action in these dockets? If yes, what?**

22
23 ⁹ *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42; *Lifeline and Link Up*, WC Docket No.
24 03-109; *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45; *Advancing Broadband Availability*
25 *Through Digital Literacy Training*, WC Docket No. 12-23; *Report and Order and Further Notice of Proposed*
Rulemaking, FCC 12-11, released Feb. 6, 2012 ("*Lifeline Reform Order*").

¹⁰ It should be noted that with the release of the *Lifeline Reform Order* (§253), the FCC eliminated Link Up support for all ETCs on non-Tribal lands.

1
2 As discussed in Sprint's response to Item 1 above, at this point the Commission should
3 focus its attention on ensuring that carriers comply with the timing and implementation of
4 the intrastate access charge reductions detailed in the FCC's *CAF Order* and the
5 corresponding FCC rules. Further, Sprint believes that the Commission should hold the
6 Arizona access reform and USF dockets in abeyance.

7
8 **Issue 9 – Are current rate case procedures adequate, or should the Commission**
9 **establish procedures for rate of return carriers that are not able to absorb lost**
10 **access charge revenue?**

11 There is no need for the Commission to establish procedures to address access charge
12 revenue recovery as the FCC clearly did so in the *CAF Order*. Specifically, the FCC: (1)
13 Ruled there is not a need to adopt a revenue-neutral approach to allow for the recovery of
14 lost access revenue resulting from the transition of access charges, and that it had no legal
15 obligation to allow full recovery "absent a showing of taking."¹¹; (2) Established "a
16 rebuttable presumption that the reforms adopted in this [*CAF*] *Order*, including the
17 recovery of Eligible Recovery from the ARC and CAF, allow incumbent LECs to earn a
18 reasonable return on their investment."¹²; (3) Established "a "Total Cost and Earnings
19 Review," through which a carrier may petition the Commission to rebut presumption and
20 request additional support."¹³; and (4) Ruled that "the limited recovery permitted will be
21 more than sufficient to provide carriers reasonable recovery for regulated services, ..." ¹⁴

22
23
24

¹¹ See CAF Order, ¶ 924.

25 ¹² See *Id.*

¹³ See *Id.*

¹⁴ See *Id.*

1 Therefore, if a rate of return carrier feels that the ARC and CAF Funds establish by the
2 FCC's *CAF Order* do not allow for a reasonable recovery for lost access revenues, the
3 proper procedure is for the carrier to rely upon the FCC's "Total Cost and Earnings
4 Review" appeal process to seek additional recovery.

5
6 **Issue 10 – Should the Commission seek carrier-specific information about the
7 anticipated impact of the FCC's *CAF Order* on carrier revenues? If yes, for all
8 carriers, or, e.g., only from rate of return carriers?**

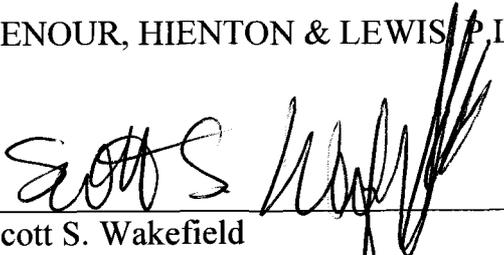
9
10 Yes the Commission should seek carrier-specific information regarding the anticipated
11 impact of the FCC's *CAF Order* for the purpose of ensuring compliance with the required
12 intercarrier rate reductions. As previously discussed in Sprint's response to Item 3 above,
13 such information should be provided well in advance of July 1, 2012 tariff effective date
14 mandated in ¶801 of the *CAF Order*. Providing the carrier-specific information on or
15 before May 30, 2011 will permit the interested parties to perform a review of the data
16 prior to the actual July 1, 2012 tariff effective date. All ILECs should provide
17 information, and all interested parties should be permitted to review the information of
18 these carriers to assist the Commission with ensuring compliance with ¶801 of the *CAF*
19 *Order*. Moreover, since CLECs must benchmark to the ILEC rates on July 1, 2012, it is
20 imperative that CLECs be granted the opportunity to review the ILEC information prior
21 to that date.

22
23 **Issue 11 – Are there any other issues that can or should be addressed in these
24 dockets? If yes, how should they be addressed procedurally?**

25 No, there are no additional issues which Sprint wishes to address at this time.

1
2
3 Respectfully submitted this 15th day of May, 2012.

4 RIDENOUR, HIENTON & LEWIS P.L.L.C.

5
6 By 

7 Scott S. Wakefield
8 201 N. Central Avenue, Suite 3300
9 Phoenix, AZ 85004-1052
10 Attorneys for Sprint Communications
11 Company, L.P., Sprint Spectrum, L.P. and
12 Nextel West Corp.

13 And

14 Stephen H. Kukta
15 Director Governmental Affairs
16 Sprint Nextel
17 201 Mission St., Suite 15000
18 Mailstop: CASFOR 1501
19 San Francisco, CA 94105

20 ORIGINAL and 13 copies of
21 the foregoing filed this 15th-day
22 May, 2012 with:

23 Docket Control
24 Arizona Corporation Commission
25 1200 West Washington
Phoenix, AZ 85007

COPIES of the foregoing hand-
delivered this 15th-day of May, 2012, to:

Janice Alward, Chief Counsel
Legal Division
Arizona Corporation Commission

1 1200 W. Washington St.
Phoenix, AZ 85007

2 Steven M. Olea, Director
3 Utilities Division
4 Arizona Corporation Commission
5 1200 W. Washington St.
Phoenix, AZ 85007

6 Lyn Farmer
7 Chief Administrative Law Judge
8 Arizona Corporation Commission
1200 W. Washington St.
Phoenix, AZ 85007

9 COPIES of the foregoing mailed/emailed
10 this 5th day of May, 2012 to:

11
12 Jane L. Rodda
13 Administrative Law Judge
14 Hearing Division
15 Arizona Corporation Commission
16 400 West Congress
17 Tucson, AZ 85701

18 Jeffrey W. Crockett
19 Bradley S. Carroll
20 Snell & Wilmer, L.L.P.
21 One Arizona Center
22 Phoenix, AZ 85004-2202

23 Michael M. Grant
24 Gallagher & Kennedy, P.A.
25 2575 E. Camelback Road
Phoenix, AZ 85016-9225
mmg@gknet.com*

William J. Hayes, General Manager
Table Top Telephone Company, Inc.
600 North Second Avenue
Ajo, AZ 85321

Dennis D. Ahlers
Associate General Counsel
Integra Telecom
6160 Golden Hills Drive
Golden Valley, MN 55402
ddahlers@eschelon.com*

Cathy Murray
Manager, Regulatory Affairs
Integra Telecom
6160 Golden Hills Drive
Golden Valley, MN 55402

Norm Cutright
Reed Peterson
Century Link
20 E. Thomas Rd., 16th Flr.
Phoenix, AZ 85012

Greg L. Rogers
Senior Corporate Counsel
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield, CO 80021
Greg.rogers@level3.com*

1 Isabelle Salgado
2 AT&T Nevada
3 645 E. Plumb Lane, B132
4 P.O. Box 11010
5 Reno, NV 89520
6 gc1831@att.com*

7 Mark A. DiNunzio
8 Cox Arizona Telcom, LLC
9 1550 West Deer Valley Rd.
10 MS DV3-16, Bldg. C
11 Phoenix, AZ 85027
12 mark.dinunzio@cox.com*

13 Michael W. Patten
14 Roshka DeWulf & Patten, PLC
15 One Arizona Center
16 400 E. Van Buren, Suite 800
17 Phoenix, AZ 85004
18 mpatten@rdp-law.com*

19 Nathan Glazier
20 Regional Manager
21 Alltel Communications, Inc.
22 4805 E. Thistle Landing Dr.
23 Phoenix, AZ 85044
24 Nathan.glazier@alltel.com*

25 Joan S. Burke
Law Office of Joan S. Burke
1650 N. First Avenue
Phoenix, AZ 85003
joan@jsburkelaw.com*

Thomas H. Campbell
Michael Hallam
Lewis and Roca, LLP
40 North Central Avenue
Phoenix, AZ 85004
tcampbell@lrlaw.com*
mhallam@lrlaw.com*

Patrick J. Black
Fennemore Craig
3003 N. Central Ave., Suite 2600

Arizona Payphone Association
Karen E. Nally
Law Office of Karen E. Nally, PLLC
3420 E. Shea Blvd., Suite 200
Phoenix, AZ 85028

Paul Castaneda
President, Local 7019
Communication Workers of America
11070 N. 24th Avenue
Phoenix, AZ 85029

Thomas W. Bade
Arizona Dialtone
6115 S. Krene Rd., #103
Tempe, AZ 85283
TomBade@arizonadialtone.com*

Craig A. Marks
Craig A. Marks, PLC
10645 N. Tatum Blvd., Suite 200-676
Phoenix, AZ 85028

William Haas
McLeodUSA Telecommunications
6400 SW C Street
P.O. Box 3177
Cedar Rapids, IA 52406-3177
Bill.haas@mcleodusa.com*

Brad VanLear
Orbitcom, Inc.
1701 N. Louise Ave.
Sioux Falls, SD 57107
bvanlear@svtv.com*

Charles H. Carrathers, III
General Counsel
Verizon, Inc.
HQE03H52
600 Hidden Ridge
Irving, TX 75015-2092
Chuck.carrathers@verizon.com*

1 Phoenix, AZ 85012
2 pblack@fclaw.com*

3 Rex Knowles
4 XO Communications, Inc.
5 111 E. Broadway, Suite 1000
6 Sal Lake City, UT 84111
7 Rex.knowles@xo.com*

8 Lyndall Nipps
9 TW Telecom
10 845 Camino Sur
11 Palm Springs, CA 92262
12 lyndall.nipps@twtelecom.com*

13 Douglas Denney
14 Director, Costs & Policy
15 Integra Telecom, Inc.
16 6160 Golden Hills Drive
17 Golden Valley, MN 55416

Dan Pozefsky
Chief Counsel
Residential Utility Consumer Office
1110 W. Washington St., Suite 220
Phoenix, AZ 85007
dpozefsky@azruco.gov*

Gary Joseph
Arizona Payphone Association
Sharnet Communications
4633 West Polk Street
Phoenix, AZ 85043
garyj@nationalbrands.com*

Gregory Castle
AT&T Services, Inc.
525 Market St., Room 2022
San Francisco, CA 94105

18 By: 

19 *Parties marked with an "*" have
20 agreed to accept service electronically.
21
22
23
24
25