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BEFORE THE ARIZONA CORPORATION

COMMISSIONERS

BOB STUMP - CHAIRMAN
GARY PIERCE
BRENDA BURNS
BOB BURNS
SUSAN BITTER SMITH

Arizona Corporation Commission

DOCKETED

MAR 14 2014

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IN THE MATTER OF THE APPLICATION OF
TABLE TOP TELEPHONE COMPANY, INC.,
A NEVADA CORPORATION, FOR A
HEARING TO DETERMINE THE EARNINGS
OF THE COMPANY, THE FAIR VALUE OF
THE COMPANY FOR RATEMAKING
PURPOSES, AND TO INCREASE
RESIDENTIAL RATES AS NECESSARY TO
COMPENSATE FOR THE RATE IMPACTS
OF THE FCC'S USF/ICC
TRANSFORMATION ORDER.

DOCKET NO. T-02724A-13-0416

ORIGINAL

**STAFF'S REQUEST FOR A SUSPENSION
OF THE PROCEDURAL SCHEDULE**

The Utilities Division Staff ("Staff") of the Arizona Corporation Commission ("Commission") respectfully requests an extension of time to file its Staff Report and a temporary suspension of the procedural schedule in this matter. Table Top Telephone Company, Inc. ("Table Top") filed an Application on December 4, 2013, to increase its residential rates as necessary to compensate for the rate impacts of the Federal Communications Commission's ("FCC") November 18, 2011 Comprehensive Universal Service and Inter-carrier Compensation Reform Order ("Transformation Order"). The FCC's Transformation Order established local residential rate floors of \$10.00 as of June 1, 2012; and \$14.00 as of June 1, 2013, with the floor thereafter being determined annually by the FCC's Wireline Competition Bureau, based on a nationwide average. If a carrier's rates are not equal to or higher than the rate floor, the carrier's federal high-cost loop support will be reduced by the amount their flat-rate residential local service rates fall below the floor.

Because the Wireline Competition Bureau has not yet determined the rate floor for June 1, 2014, Table Top's Application asks that the Commission set the rate floor for June 1, 2014 at the lower of \$19.00 or the actual rate floor set by the FCC. Because of recent developments at the federal level, it is uncertain when the new rate floor will be set and what the effective date of that rate floor will be.

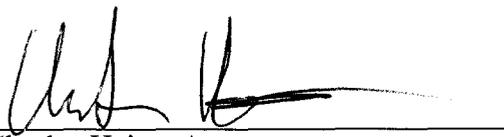
1 On March 11, 2014, the Eastern Rural Telecom Association (“ERTA”); the Independent
2 Telephone & Telecommunications Alliance (“ITTA”); NTCA – The Rural Broadband Association
3 (“NTCA”); the National Exchange Carrier Association (“NECA”); the United States Telecom
4 Association (“USTelecom”); and WTA – Advocates for Rural Broadband (“WTA”) (collectively
5 “the Associations”) filed a request with the FCC asking that the effective date for the as yet
6 unannounced 2014 local service floor be extended from July 1, 2014 to January 2, 2015. The FCC is
7 likely to seek comment on the Associations’ request before it makes any determination on the rate
8 floor and whether to extend the date for compliance.

9 Because of these recent developments, Staff does not believe that it would be productive to
10 proceed with this Application at this time. Staff requests a temporary suspension of the procedural
11 schedule until the FCC both sets the local service rate floor and gives guidance to carriers and states
12 on how to proceed; or the FCC rules on the Associations’ request for an extension of time.

13 Staff suggests that the Commission still proceed with public comment on the original hearing
14 dates so members of the public would not be adversely affected.

15 WHEREFORE, the Utilities Division Staff respectfully requests a temporary suspension of
16 the procedural schedule in this matter until the FCC both sets the local service rate floor and gives
17 guidance to carriers and states on how to proceed; or the FCC rules on the Associations’ request for
18 an extension of time.

19 RESPECTFULLY SUBMITTED this 14th day of March, 2014.

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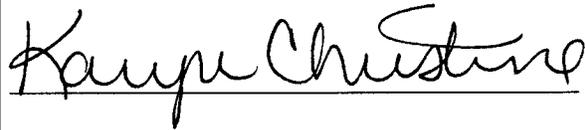
1 Original and thirteen (13) copies
2 of the foregoing filed this
14th day of March 2014 with:

3 Docket Control
4 Arizona Corporation Commission
1200 West Washington Street
5 Phoenix, Arizona 85007

6 Copy of the foregoing emailed/mailed
this 14th day of March 2014 to:

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