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Attorneys for Qwest Corporation

## BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of: QWEST CORPORATION'S Land Development Agreements (LDA) Tariff Provisions Docket No. 03-049-62

QWEST'S MOTION FOR ENLARGEMENT OF TIME TO FILE BRIEF ON COST POLICY ISSUES

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Qwest Corporation ("Qwest"), pursuant Utah Administrative Code R746-100.H. and Rule 6(b) of the Utah Rules of Civil Procedure, hereby respectfully moves for an enlargement of time in which to file its opening brief on cost policy issues. Qwest seeks an extension until February 9, 2004. Qwest's brief is currently due today, February 5, 2004. Qwest further requests that the response and reply deadlines currently set for February 26 and March 18, 2004

each be moved back four days, to March 1 and March 22 respectively, in order to avoid any shortening of response or reply times as a result of Qwest's proposed extension.

Qwest seeks enlargement in order to accommodate other pressing business involving

Qwest and undersigned counsel. No party will be prejudiced by this short extension of time.

Counsel for Qwest has been in contact with Patricia Schmid of the Utah Attorney General's

office, counsel for the Division of Public Utilities; Anthony Kaye of Ballard Spahr Andrews and

Ingersoll, counsel for Clear Wave Communications, East Wind Enterprises and Prohill; and

Kevin McDonough of Mismash & McDonough, counsel for SBS Telecommunications and

Silver Creek Communications. All of the aforesaid counsel have agreed to the proposed

extension.<sup>1</sup>

Qwest is aware of no other party that is represented by counsel or has otherwise formally entered an appearance in this proceeding, but if this motion is granted Qwest will attempt to identify and contact any other interested parties who have participated in this docket to date, in an attempt to notify those parties of the amended briefing schedule.

<sup>&</sup>lt;sup>1</sup> Counsel agreed to the extension on the expectation that Qwest will agree to allow other parties similar reasonable extensions if needed.

WHEREFORE, Qwest respectfully requests that this motion for enlargement be granted and that the briefing schedule in this docket be amended accordingly.

Respectfully Submitted: February 5, 2004.

Gregory B. Monson Ted D. Smith David L. Elmont STOEL RIVES LLP

Robert C. Brown Qwest Services Corporation

Attorneys for Qwest Corporation

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing QWEST'S MOTION FOR

ENLARGEMENT OF TIME TO FILE BRIEF ON COST POLICY ISSUES was served

upon the following by electronic mail, on this 5th day of February 2004.

Patricia E. Schmid Assistant Attorney General pschmid@utah.gov

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