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Attorneys for Union Telephone Company

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF UTAH

IN THE MATTER OF THE PETITION OF QWEST CORPORATION FOR ARBITRATION OF AN INTERCONNECTION AGREEMENT WITH UNION TELEPHONE COMPANY D/B/A UNION CELLULAR UNDER SECTION 252 OF THE FEDERAL TELECOMMUNICATIONS ACT OF 1996

Docket No. 04-049-145

JOINT MOTION TO CONTINUE HEARING SCHEDULE

Union Telephone Company ("Union"), by and through its undersigned counsel, hereby files this Joint Motion to Continue Hearing Schedule. The undersigned has conferred with counsel for Qwest Corporation ("Qwest") and is authorized to represent that Qwest joins in this Motion. In support of this Joint Motion, the parties state:

- 1. Since the hearing was established in this docket, Qwest and Union have been involved in a similar arbitration proceeding in Colorado that concluded with the filing of position statements. The Colorado Public Utilities Commission is currently considering issues identical to those presented in this proceeding.
- 2. In addition, neither Qwest's nor Union's witnesses are available to testify on March 22, 2006 through March 24, 2006 when the hearing in this matter is scheduled.

3. In order to ensure that the Commission has adequate time to conduct a hearing and render a decision in this matter, the parties agree that the Commission's Order indefinitely extending the statutory deadline set forth in 47 U.S.C. §252(d)(4) for the completion of this proceeding continue.

WHEREFORE, Union Telephone Company and Qwest Corporation respectfully request that the Administrative Law Judge vacate the current hearing dates, hold a scheduling conference, and establish new dates for the hearing.

DATED this 23<sup>rd</sup> day of February, 2006.

Stephen F. Mecham

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Joint Motion to Continue Hearing Schedule was provided to the following parties by electronic mail on the 23<sup>rd</sup> day of February, 2006:

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