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BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE PETITION OF)	DOCKET NO. 04-049-145
QWEST CORPORATION FOR)	
ARBITRATION OF AN)	
INTERCONNECTION AGREEMENT)	THIRD JOINT MOTION TO
WITH UNION TELEPHONE COMPANY)	VACATE PROCEDURAL
D/B/A UNION CELLULAR UNDER)	SCHEDULE, WAIVE
SECTION 252 OF THE FEDERAL)	STATUTORY DEADLINE AND
TELECOMMUNICATIONS ACT OF 1996)	SET PROCEDURAL
		CONFERENCE

Qwest Corporation ("Qwest") and Union Telephone Company ("Union"), by and through their counsel, once again jointly move this Commission to vacate the existing procedural schedule, set a further prehearing conference and give notice of their agreement to further waive the statutory deadline. In support of this joint motion, Qwest and Union state:

1. On November 23, 2004, Qwest and Union filed a joint motion to vacate the procedural schedule, set a further procedural conference and notice of parties' agreement to extend the statutory deadline. In the motion, Qwest and Union explained that they had been engaged in negotiations over the terms and conditions for an

interconnection agreement governing their relationship in Utah. While the parties were uncertain of the outcome, they were generally pleased with the discussions that had occurred and believed that additional discussions would be beneficial.

- 2. The Administrative Law Judge ("ALJ") granted the joint motion on November 24, 2004. The ALJ ordered that a prehearing conference be conducted on January 25, 2005.
- 3. On January 19, 2005, the parties filed a second joint motion to vacate the procedural schedule, set a further procedural conference and notice of parties' agreement to waive the statutory deadline. Once again, Qwest and Union explained that their negotiations over the terms and conditions of an interconnection agreement were ongoing, that the parties' were making progress in their negotiations and that they both believed that additional discussions would be beneficial.
- 4. The ALJ granted the parties second joint motion on January 24, 2005. The ALJ ordered that a prehearing conference be conducted on March 22, 2005.
- 5. Although the parties continue to be uncertain of the outcome, they continue to be pleased with the discussions that have occurred. There have been a number of meetings between representatives of Qwest and Union since the time they filed their first and second joint motions, and the parties continue to winnow the issues in dispute. Both Qwest and Union believe that additional discussions would be beneficial.
- 6. In order to give the parties adequate time to continue the discussions and complete the negotiations, Qwest and Union jointly agree to further waive the statutory deadline set forth in 47 U.S.C. § 252 (b) (4) for the completion of these proceedings.

The current deadline is June 24, 2005. The parties hereby agree to extend this deadline for an additional 40 days, or until August 2, 2005.

- 7. Qwest and Union also request that the Commission set a status conference on or about May 3, 2005 for the purpose of reporting on the status of the negotiations and to set a further schedule, if necessary. The parties' request that the existing prehearing conference scheduled for March 22, 2005, be vacated.
- 8. Counsel for Union has authorized undersigned counsel to sign this motion on his behalf.

DATED: March 15th, 2005.

Respectfully submitted,

By:

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **JOINT MOTION TO VACATE PROCEDURAL SCHEDULE, WAIVE STATUTORY DEADLINE AND SET PROCEDURAL CONFERENCE** to be served by electronic mail and/or by U.S. Mail, postage prepaid, to the following on this 15th day of March, 2005:

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