Robert C. Brown
Jeff Nodland
Corporation Counsel
Qwest Services Corporation
1801 California, Suite 1000
Denver, CO 80202

Telephone: (303) 383-6642

Fax: (303) 296-3132

Email: Robert.Brown@qwest.com Jeff. Nodland@qwest.com

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

IN THE MATTER OF THE COMPLAINT **DOCKET NO. 05-054-01** OF UNION TELEPHONE COMPANY, a **Wyoming Corporation, Against QWEST**) **QWEST CORPORATION'S** CORPORATION, fka US WEST **SUBMISSION OF** COMMUNICATIONS, INC., a Colorado **SUPPLEMENTAL** Corporation. **AUTHORITY IN CONNECTION WITH ITS** MOTION TO DISMISS, OR IN THE ALTERNATIVE, FOR A **MORE DEFINITE STATEMENT**

Qwest Corporation, ("Qwest"), by and through its counsel, hereby files the following supplemental authority in support of its Motion to Dismiss, or in The Alternative For a More Definite Statement.

Attached hereto as Attachment A is the Order Granting Qwest's Motion for a More

Definite Statement of the Colorado Public Utilities Commission which was entered by the

Administrative Law Judge in the Colorado docket on April 11, 2005. The motion that the

Colorado Commission was considering is substantially identical to the motion filed by Qwest

and which is pending before the Utah Public Service Commission ("Commission"). In the Order

from Colorado the ALJ agrees that Union's "complaint is so utterly lacking in any detail as to preclude Qwest from filing a responsive pleading." Order at ¶ 3.

For the same reasons set forth in the Order from the Colorado Commission, this Commission should likewise grant Qwest's motion for a more definite statement.

Dated this 13TH day of March, 2005

Respectfully submitted,

Robert Brown, Esq Qwest Services Corporation 1801 California St., 10th Floor Denver, CO 80202

Telephone: (303) 383-6642

Fax: (303) 296-3132

e-mail: robert.brown@qwest.com Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **MOTION TO DISMISS, OR IN THE ALTERNATIVE, FOR A MORE DEFINITE STATEMENT** to be served by electronic mail and/or by U.S. Mail, postage prepaid, to the following on this 11th day of March, 2005:

Michael Ginsberg
Patricia Schmid
Mark Shurtleff
Counsel for Division of Public Utilities
PO Box 140857
Salt Lake City, UT 84114-0857
mginsberg@utah.gov

James Woody
Executive Vice President
Union Telephone Company d/b/a Union Cellular
850 N. Hwy 414,
P.O. Box 160
Mountain View Wyoming 82939
jwoody@union-tel.com

Bruce Asay, Esq.
Counsel for Union Telephone
1807 Capitol Ave.
Suite 203
Cheyenne, WY 82001
basay@associatedlegal.com

Stephen F. Mecham Callister, Nebeker & McCullough 10 E. South Temple, Suite 900 Salt Lake City, UT 84133 sfreecham@cnmlaw.com