

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

Qwest Corporation (“Qwest”) and Union Telephone Company (“Union”) by and through their undersigned counsel jointly move this Commission to vacate the procedural schedule established in this case, waive the statutory deadline and to set a further procedural scheduling conference. In support of this joint motion Qwest and Union state:

1. Since the procedural schedule was established in this docket, Qwest and Union have been engaged in negotiations over the terms and conditions for an interconnection agreement governing their relationship in Utah. While the parties are uncertain of the outcome, they are generally pleased with the discussions which have occurred and believe that additional discussions will be beneficial.

2. In order to give the parties adequate time to continue the discussions and complete the negotiations Qwest and Union jointly agree to waive the statutory deadline set forth in 47 U.S.C. § 252 for the completion of these proceedings. The current deadline is January 23, 2005. The parties hereby agree to extend this deadline for 90 days, or until April 23, 2005.

3. Qwest and Union also request that the Commission set a status conference 60 days from today's date for the purpose of reporting on the status of the negotiations and to set a further schedule, if necessary. In the interim, the existing procedural order would be vacated.

4. Counsel for Union has authorized the undersigned counsel to sign this motion on his behalf.

DATED: November 23, 2004.

Respectfully submitted,

Robert C. Brown
Jeff Nodland
Corporation Counsel
Qwest Services Corporation

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd of November, 2004, a copy of the foregoing **JOINT MOTION TO VACATE PROCEDURAL SCHEDULE, WAIVE STATUTORY DEADLINE AND SET PROCEDURAL CONFERENCE** was served and a copy was placed in the United States mail, postage prepaid, unless otherwise indicated to the following:

Howard D. Woody
President
Union Telephone Company d/b/a Union Cellular
850 N. Hwy 414
PO Box 160
Mountain View, WY 82939

James Woody
Executive Vice President
Union Telephone Company d/b/a Union Cellular
850 N. Hwy 414
PO Box 160
Mountain View, WY 82939
jwoody@union-tel.com
(via electronic mail)

Albert H. Neff
Registered Agent for Union Telephone
HCR 65 BOX 620
Manila, Utah 84046

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

Stephen Mecham
Callister, Nebeker & McCullough
10 East South Temple, Suite 900
Salt Lake City, UT 84133
sfmecham@cnmlaw.com
(via electronic mail)
