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Attorneys for Union Telephone Company

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

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|------------------------------------|---|-----------------------|
| IN THE MATTER OF THE PETITION OF |) | |
| QWEST CORPORATION FOR ARBITRATION |) | Docket No. 04-049-145 |
| OF AN INTERCONNECTION AGREEMENT |) | |
| WITH UNION TELEPHONE COMPANY D/B/A |) | |
| UNION CELLULAR UNDER SECTION 252 |) | MOTION TO |
| OF THE FEDERAL TELECOMMUNICATIONS |) | CONSOLIDATE HEARING |
| ACT OF 1996 |) | |

The Respondent, Union Telephone Company (“Union”), by and through its undersigned counsel, Associated Legal Group, LLC, hereby moves this Honorable Commission through its Administrative Law Judge for an order consolidating the hearings in the above captioned matter.

In support of its Motion, Union states as follows:

1. Qwest Corporation (“Qwest”) has filed for arbitration of an interconnection agreement in the above captioned matter and the same has been stayed by the Commission for a number of months as the Parties have repeatedly requested extensions to allow an opportunity to negotiate the terms and conditions of an interconnection agreement. The Parties have been

unsuccessful and now seek to move the case forward to hearing. Notwithstanding the failure of the Parties to negotiate all of the terms and conditions, the Parties have been successful in winnowing the issues for review by the Commission and in establishing an Interim Interconnection Agreement.

2. At this time, as will be noted to the Administrative Law Judge as part of a scheduling conference and any proposed schedule, the Parties have reduced the number of issues for review and believe that there will only be a few major issues for consideration as part of the administrative hearing. Nevertheless, the Parties anticipate that the hearing in the above captioned matter will take approximately four (4) days and will involve fairly intense discussion and argument on those issues, including the level of compensation, which are important to the Parties. It is anticipated that as the Parties have negotiated the terms for an Interim Interconnection Agreement in both Utah and Colorado, the hearing on the remaining issues in these two jurisdictions will be identical. In other words, the filings for both the jurisdictions in Colorado and in Utah will mirror one another. Just as the Parties have filed Interim Interconnection Agreements that are substantially similar, it is anticipated that the matrices, prefiling motions, witness statements, and hearings will be nearly identical and certainly substantively identical.

3. Given the fact that any expenditure by the Parties in preparing for a hearing will have to be duplicated to accomplish the same hearing preparation and testimony in another jurisdiction, it saves the resources of the respective Commissions and the Parties to consolidate the hearings rather than duplicating them. If the Parties hold a hearing in Colorado and then have to duplicate the same in Utah, they will have to duplicate their effort in preparing witnesses,

witness statements, designations, and testimony as well as any post-hearing material to be filed.

If a consolidated hearing is entertained by the respective jurisdictions, the Parties can save expense and time in presenting the materials to the Commissions as well as in receiving a determination.

4. As an illustration, if the hearings were consolidated by the respective Commissions and the administrative law judge for one jurisdiction were to travel to the other, the Parties could present the hearing to the administrative law judges sitting jointly. The judges could then hear the evidence presented at the same time, and each take a copy of the hearing record to their respective jurisdictions. As each would hear the same testimony, there would be an enhanced opportunity that their respective decisions would be consistent and the Parties would have saved time and expense.

WHEREFORE, Union Telephone Company, requests of this Commission that it consider and allow a joint hearing on the testimony in order to save administrative expense for the Commission and the Parties.

DATED this _____ day of _____, 2005.

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Motion to Consolidate Hearings to be served by electronic mail and/or U.S. Mail, postage prepaid, to the following named Parties on this _____ day of July 2005, and addressed as follows:

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