

Gregory J. Kopta (WSBA No. 20519)
DAVIS WRIGHT TREMAINE LLP
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688
Telephone: (206) 628-7692
Facsimile: (206) 628-7699
E-mail: gregkopta@dwt.com

Attorneys for Covad Communications Company,
Eschelon Telecom of Utah, Inc., Integra Telecom of
Utah, Inc., McLeodUSA Telecommunications
Services, Inc., and XO Communications Services, Inc.

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation into Qwest Wire Center Data	Docket No. 06-049-40 JOINT CLEC MOTION FOR EXTENSION OF DEADLINE FOR FILING RESPONSIVE COST INFORMATION
---	---

Covad Communications Company, Eschelon Telecom of Utah, Inc., Integra Telecom of Utah, Inc., McLeodUSA Telecommunications Services, Inc., and XO Communications Services, Inc. (collectively “Joint CLECs”) respectfully request that the Commission extend the deadline for filing a response to the cost information filed by Qwest Corporation (“Qwest”) pursuant to the Commission’s Report and Order (“Order”).

MOTION

The Order provides,

Qwest Corporation shall file within thirty days from the date of issuance of this Order, in the form of sworn written testimony and argument, additional information relating to the actual costs Qwest Corporation incurs, or will incur, when converting UNEs to private line services. Not later than fifteen days after said filing, the Joint CLECs and the Division of Public

Utilities shall, if desired, file sworn rebuttal testimony and argument on this issue.

Qwest filed cost information pursuant to the Order on October 11, 2006, and the Joint CLECs' response is due October 26, 2006.

As the Order contemplates, Douglas Denney, who provided prior testimony on behalf of the Joint CLECs in this proceeding, will be responsible for preparing the Joint CLECs' response. Mr. Denney, however, is out of the office in hearings and workshops in unrelated cases in Minnesota every day from today through the end of October and will be unable to review, much less respond to, Qwest's filing by October 26. In addition, Qwest and the Joint CLECs are engaged in multi-state settlement negotiations to resolve issues arising out of implementation of the Triennial Review Remand Order, including any nonrecurring charges for converting affected unbundled network elements to Qwest private line or special access services. To enable Mr. Denney to analyze and respond to Qwest's cost information and to allow additional time for potential resolution of the nonrecurring charge issue, therefore, the Joint CLECs request that the Commission extend the deadline for filing responses to Qwest's filing until November 16, 2006.

PRAYER FOR RELIEF

WHEREFORE, the Joint CLECs request that the Commission extend the deadline for filing a response to Qwest's cost information until November 16, 2006.

Dated this 12th day of October, 2006.

DAVIS WRIGHT TREMAINE LLP

By: _____
Gregory J. Kopta