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Attorneys for Qwest Corporation

BEFORE THE PUBLIC SERVICE COMMISSION OF UTAH

In the Matter of the Investigation into Qwest Wire Center Data	Docket No. 06-049-40 QWEST’S RESPONSE TO THE JOINT CLECS’ MOTION FOR EXTENSION OF DEADLINE FOR FILING RESPONSIVE COST INFORMATION, AND MOTION FOR OPPORTUNITY TO FILE RESPONSE TESTIMONY
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Qwest Corporation (“Qwest”) hereby responds to the motion for extension of the deadline for filing responsive cost information that Covad Communications Company, Eschelon Telecom of Utah, Inc., Integra Telecom of Utah, Inc., McLeodUSA Telecommunications Services, Inc., and XO Communications Services, Inc. (collectively “the Joint CLECs”) filed on October 12, 2006. In addition, Qwest respectfully moves for an opportunity to file responsive testimony to the Joint CLECs’ rebuttal testimony.

RESPONSE TO CLEC MOTION AND MOTION FOR RESPONSIVE TESTIMONY

In the Commission’s September 11, 2006 Report and Order (“Order”), the Commission required Qwest to file “whatever cost information it deems appropriate to this issue [the

appropriate nonrecurring charge for the conversion of unbundled network elements to alternative Qwest services at non-impaired wire centers].” Order, p. 36. The Order also provided that “[t]he Joint CLECs and the Division shall then have fifteen days from the date of filing of said [cost] information to file rebuttal testimony.” *Id.* Qwest thereafter timely filed its cost study with an affidavit of its witness on this issue, Theresa Million, on October 11, 2006. The Joint CLECs have filed a motion to extend the October 26, 2006 rebuttal testimony date to November 16, 2006.

Qwest does not oppose the Joint CLECs’ motion for an extension until November 16, 2006 in light of the press of business that the Joint CLECs provide as the reasons for their motion. However, Qwest also requests an opportunity to file responsive testimony to the Joint CLECs’ testimony regarding Qwest’s cost study.

Qwest notes that the Commission’s September 11, 2006 Report and Order that required Qwest to provide any cost information it deems appropriate did not specifically provide an opportunity for Qwest to file responsive testimony to the Joint CLECs’ testimony. Obviously, Qwest does not know whether the Order’s lack of a specific opportunity for Qwest to file responsive testimony was intentional or simply an oversight by the Commission. Nevertheless, Qwest believes that responsive testimony to the Joint CLECs’ testimony regarding the Qwest cost study would be appropriate under the circumstances. Specifically, Qwest believes that if the Joint CLECs are permitted an opportunity to file testimony and comment about Qwest’s cost study, Qwest also should have an opportunity to respond to such testimony, in part so that Qwest can explain any concerns or objections that the Joint CLECs may raise in their testimony.

Thus, Qwest respectfully requests that the Commission grant Qwest an opportunity to file responsive testimony to the Joint CLECs’ rebuttal testimony within 15 days of the filing of such Joint CLEC testimony. Qwest does not believe that there would be any prejudice to the Joint

CLECs to allow Qwest an opportunity to file such responsive testimony, and further believes that the Commission would benefit by having Qwest file testimony in response to the Joint CLECs' cost study testimony before it makes its decision on this cost study issue.

CONCLUSION

Accordingly, Qwest does not oppose the Joint CLECs' motion for extension of the deadline for filing responsive cost information. In addition, Qwest further respectfully requests an opportunity to file responsive testimony to the Joint CLECs' cost study testimony.

Dated: October 19, 2006

Respectfully submitted,

QWEST CORPORATION

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CERTIFICATE OF SERVICE
DOCKET NO. 06-049-40

I hereby certify that on the date given below, true and complete copies of the following documents: (1) Qwest's Response to the Joint CLECs' Motion for Extension of Deadline for Filing Responsive Cost Information, and Motion for Opportunity to File Response Testimony, and (2) Certificate of Service, were served both by electronic e-mail and U.S. Mail, on the following:

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Dated this 19th day of October, 2006

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