**BEFORE THE WASHINGTON STATE**

**UTILITIES AND TRANSPORTATION COMMISSION**

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| In the Matter of the Petition for  Arbitration of an Interconnection  Agreement Between  NORTH COUNTY  COMMUNICATIONS  CORPORATION OF WASHINGTON,  with  QWEST CORPORATION  Pursuant to 47 U.S.C. Section 252(b). | Docket UT-093035  NORTH COUNTY COMMUNICATIONS  CORPORATION’S PETITION TO REPLY IN SUPPORT OF ITS MOTION TO DISMISS QWEST CORPORATION’S PETITION FOR ARBITRATION |

*1* North County Communications Corporation (“North County”), by and through its counsel of record, hereby petitions the Washington Utilities and Transportation Commission (the “Commission”) to file and accept the attached reply brief in the above-captioned matter to point out issues Qwest Corporation (“Qwest”) has admitted by failing to address and to dispel any confusion created by irrelevant facts or arguments raised by Qwest in its response. This petition is made pursuant to scheduling Order 05 (service date March 9, 2010) which contemplates such a petition to reply and WAC 480-07-390, which allows the Commission to accept such a brief as needed. This brief is limited to new issues, arguments, and authority raised by Qwest in its responsive answer to North County’s motion to dismiss.

Dated this 16th day of April, 2010, in San Diego, California.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have served the foregoing document this day upon all parties of record (listed below) in these proceedings by mailing a copy properly addressed with first class postage prepaid.

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| Lisa A. Anderl  Qwest Corporation  1600 7th Avenue, Room 1506  Seattle, WA 98191  (206) 345-1574  [Lisa.anderl@qwest.com](mailto:Lisa.anderl@qwest.com) |  |
| David W. Danner,  Executive Director and Secretary  Washington Utilities & Transportation Commission  1300 S. Evergreen Park Drive, SW  P.O. Box 47250  Olympia, WA 98504-7250 |  |
| Adam E. Torem, Arbitrator  Washington Utilities & Transportation Commission  1300 S. Evergreen Park Drive, SW  P.O. Box 47250  Olympia, WA 98504-7250  [atorem@utc.wa.gov](mailto:atorem@utc.wa.gov) |  |

Dated this 16th day of April 2010, in San Diego, California.

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Jessica Hartgrave