

**BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION**

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).

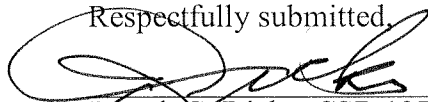
Docket UT-093035

NORTH COUNTY COMMUNICATIONS  
CORPORATION'S PETITION TO REPLY  
IN SUPPORT OF ITS MOTION TO DISMISS  
QWEST CORPORATION'S PETITION FOR  
ARBITRATION

I 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 16<sup>th</sup> day of April, 2010, in San Diego, California.

Respectfully submitted,



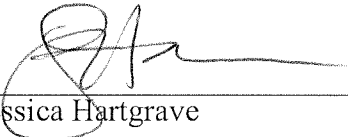
Joseph G. Dicks, CSB 127362  
Dicks & Workman, APC  
750 B Street, Suite 2720  
San Diego, CA 92101  
Telephone: (619) 685-6800  
Facsimile: (619) 557-2735  
Email: [jdicks@dicks-workmanlaw.com](mailto:jdicks@dicks-workmanlaw.com)

## 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.

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

Dated this 16<sup>th</sup> day of April 2010, in San Diego, California.

  
\_\_\_\_\_  
Jessica Hartgrave