

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF:

LEVEL 3 COMMUNICATIONS LLC INC.'S
PETITION FOR ENFORCEMENT OF
INTERCONNECTION AGREEMENT WITH
QWEST CORPORATION

DOCKET NO. UT-053039

PAC-WEST TELECOMM, INC.

Petitioner,

v.

QWEST CORPORATION,

Respondent.

DOCKET NO. UT-053036

QWEST'S MOTION FOR LEAVE TO FILE A
REPLY TO THE RESPONSE OF LEVEL 3
AND THE OPPOSITION OF PAC-WEST TO
QWEST'S MOTION TO CONSOLIDATE

1 Qwest Corporation ("Qwest"), pursuant to WAC 480-07-370(1)(d), hereby requests leave to file a reply to the responses filed by Level 3 and Pac-West on September 7, 2005 in opposition to Qwest's motion to consolidate.

2 In accordance with that rule, Qwest states that a reply is necessary to fully inform the Commission on the issues regarding consolidation, and to correct a number of incorrect

statements and allegations made in those pleadings, particularly with regard to the nature of a generic proceeding and the Commission's jurisdiction to proceed with a VNXX docket.

- 3 Qwest has attached its proposed reply hereto, and respectfully requests that the Commission consider it.

DATED this 9th day of September, 2005.

QWEST

Lisa A. Anderl, WSBA #13236
Adam L. Sherr, WSBA #25291
1600 7th Avenue, Room 3206
Seattle, WA 98191
Phone: (206) 398-2500

Alex M. Duarte
421 SW Oak Street, Suite 810
Portland, Oregon 97204
Phone: (503) 242-5623

Attorneys for Qwest Corporation