

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of Qwest Corporation to Initiate a Mass-Market Switching and Dedicated Transport Case Pursuant to the Triennial Review Order

Docket No. UT-033044

**QWEST'S MOTION FOR MODIFICATION OF ORDER NO. 8; REQUEST FOR EXPEDITED RESOLUTION**

**I. INTRODUCTION**

- 1 Qwest Corporation (“Qwest”) hereby moves the Washington Utilities and Transportation Commission (“Commission”) for modification to Order No. 8 in this matter to allow up to six (6) in-house experts to review highly confidential data. The current limitation is five (5) in-house experts. Qwest had originally requested that the limit be set at eight (8).
- 2 Modification is appropriate because Qwest needs one additional in-house expert to review highly confidential data in order to prepare rebuttal testimony. Currently, Qwest has submitted an executed Exhibit C for Mark Reynolds, David Teitzel, Peter Copeland, Dick Buckley, and Rachel Torrence. Mr. Reynolds and Mr. Teitzel have reviewed the highly confidential responses to data requests and bench requests in order to prepare testimony regarding the trigger analysis. Mr. Copeland and Mr. Buckley have reviewed the same information in order to prepare testimony about the economic models in connection with an impairment analysis. Ms. Torrence testifies about transport and must

therefore review the highly confidential testimony of Mr. Fassett, as well as responses to data requests and bench requests.

3 The sixth in-house expert is Robert Jeff Hubbard. Mr. Hubbard testifies about collocation and other operational issues and must therefore review the highly confidential testimony of Mr. Stacy in order to prepare rebuttal testimony. At the time Order No. 6 was entered, Qwest did not know that Mr. Hubbard would need to see any highly confidential information or Qwest would have pointed out at that time that it would need at least six (6) in-house experts.

4 Qwest believes that no party will be prejudiced by this expansion of the limitation. Qwest requests expedited consideration of this motion in light of the fact that rebuttal testimony is due on February 20, 2004.

DATED this 5th day of February, 2004.

QWEST

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