

**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

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