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**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the  
  
CONTINUED COSTING AND PRICING OF  
UNBUNDLED NETWORK ELEMENTS,  
TRANSPORT, TERMINATION, AND RESALE

Docket No. UT-003013 (Part D)  
  
MOTION FOR LEAVE TO FILE  
SUPPLEMENTAL DIRECT  
TESTIMONY AND EXHIBITS

Qwest Corporation ("Qwest") hereby moves for leave to file supplemental direct testimony and exhibits on the subject of access to poles, ducts, conduits, and rights of way, as well as on some rate elements associated with unbundled packet switching. When Qwest filed its direct testimony on November 7, 2001, it did not have completed cost studies for the nonrecurring costs associated with access to poles, ducts, conduits, and rights of way. Qwest now has such studies finalized, and is submitting them herewith. Qwest believes that this submission will allow sufficient time for parties to respond within the existing procedural schedule. However, if parties need additional time to review this material, Qwest has no objection to additional time being allowed. Additionally, after it filed its testimony and cost studies on November 7, Qwest realized that certain nonrecurring costs associated with unbundled packet switching were inadvertently omitted from the nonrecurring cost study. Qwest has included those elements in this filing as well.

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/// //

MOTION FOR LEAVE TO FILE SUPPLEMENTAL  
DIRECT TESTIMONY AND EXHIBITS

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RESPECTFULLY SUBMITTED this 30th day of November, 2001.

QWEST

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