

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of:)	
)	Docket No. UT-033044
QWEST CORPORATION)	
)	JOINT CLEC MOTION TO
To Initiate a Mass-Market Switching and)	SUPPLEMENT RESPONSE
Dedicated Transport Case Pursuant to the)	FILING
Triennial Review Order)	
_____)	

Eschelon Telecom of Washington, Inc., Integra Telecom of Washington, Inc., Global Crossing Local Services, Inc., McLeodUSA Telecommunications, Inc., Pac-West Telecomm, Inc., and XO Washington, Inc. (collectively “Joint CLECs”) request permission to file a revised Exhibit DRF-5HC to the Response Testimony of Dean R. Fassett that includes information provided in responses to data requests and subpoena duces tecum requests that were not available when the testimony was filed.

The Commission has authorized parties to supplement their testimony in response to the “errata” that Qwest filed to the direct testimony and select exhibits of Rachel Torrence. Joint CLEC Exhibit DRF-5HC is patterned after Exhibit RT-9HC, one of the exhibits that was revised as a result of Qwest’s errata filing. Mr. Fassett intends to revise his exhibit to correspond to the revised Qwest exhibit. Additionally, however, Mr. Fassett was required to note “Insufficient Data” for several carriers that had not yet provided responses to data requests or subpoena duces tecum requests when Mr. Fassett’s response testimony and exhibits were filed. Most, if not all, of those carriers have provided, or should provide, responses before February 20, 2004. Accordingly, the Joint CLECs request authority from the Commission to revise Exhibit DRF-5HC to include this additional information. The Joint CLECs also intend to include copies of all data request and subpoena responses on which Exhibit DRF-5HC is based as part of their February 20 filing.

Pursuant to the discussion of this issue on the February 9, 2004, prehearing conference, counsel for the Joint CLECs consulted with counsel for Qwest and was informed that Qwest does not object to this request. Accordingly, the Joint CLECs respectfully request that the Commission authorize the supplemental filing described in this motion.

DATED this 13th day of February, 2004.

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Telecom of Washington, Inc., Global Crossing Local Services,
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By _____
Gregory J. Kopta