

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

QWEST CORPORATION,

Complainant,

v.

MCLEODUSA TELECOMMUNICATIONS  
SERVICES, INC., d/b/a PAETEC BUSINESS  
SERVICES.

Respondents.

Docket No. UT-090892

PAETEC ANSWER TO QWEST  
COMPLAINT

McLeodUSA Telecommunications Services, Inc. d/b/a PAETEC Business Services (“PAETEC”) provides this Answer to the Complaint filed by Qwest Corporation (“Qwest”).

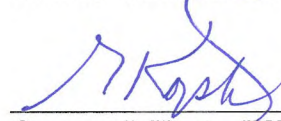
1. PAETEC neither admits nor denies the statement in paragraph 1.
2. PAETEC neither admits nor denies the information in paragraph 2.
3. PAETEC admits the allegations in paragraph 3.
4. Upon information and belief, PAETEC admits the allegations in paragraph 4.
5. PAETEC admits the allegations in paragraph 5.
6. PAETEC admits that the Commission has jurisdiction over Qwest’s complaint and over PAETEC. The referenced statutes speak for themselves and PAETEC neither admits nor denies the legal conclusions in paragraph 6.
7. PAETEC admits the allegations in the first sentence of paragraph 7. PAETEC denies the remaining allegations in paragraph 7.
8. PAETEC admits the allegations in paragraph 8.
9. PAETEC admits the allegations in paragraph 9.
10. PAETEC admits the allegations in paragraph 10.
11. PAETEC admits the allegations in paragraph 11.
12. PAETEC admits the allegations in paragraph 12.
13. PAETEC admits the allegations in paragraph 13.
14. PAETEC admits the allegations in the first sentence in paragraph 14. PAETEC denies the remainder of the allegations in paragraph 14.

15. PAETEC denies the allegations in paragraph 15.
16. PAETEC admits the allegations in paragraph 16.
17. PAETEC admits that the document attached as Exhibit C to the Complaint is an order of the Minnesota Public Utilities Commission. That order speaks for itself and PAETEC denies any inconsistent interpretation of that order.
18. PAETEC admits the allegations in paragraph 18.
19. PAETEC provides the same responses as set forth in paragraphs 1-18.
20. The statements in paragraph 20 are allegations of law, not of fact, and the cited statute speaks for itself. To the extent that any of these statements can be construed as an allegation of fact, PAETEC denies those allegations.
21. PAETEC provides the same responses as set forth in paragraphs 1-18.
22. The statements in paragraph 22 are allegations of law, not of fact, and the cited statute speaks for itself. To the extent that any of these statements can be construed as an allegation of fact, PAETEC denies those allegations.
23. PAETEC denies that Qwest is entitled to the relief requested in paragraph 23.
24. PAETEC denies that Qwest is entitled to any relief or that any relief is appropriate.

WHEREFORE, PAETEC respectfully requests that the Commission deny Qwest's Complaint.

RESPECTFULLY SUBMITTED this 1st day of July 2009.

DAVIS WRIGHT TREMAINE LLP



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