

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 CORPORATION'S MOTION FOR LEAVE TO EXCEED 20-PAGE LIMIT FOR REBUTTAL TESTIMONY

- 1 Qwest Corporation ("Qwest") hereby requests leave to exceed the 20-page limit for the rebuttal testimony of two witnesses, Peter Copeland and Rachel Torrence. The need for the additional pages is described below. In each case, it is not anticipated that the testimony will exceed 35-40 pages in length.
- 2 Mr. Copeland is rebutting the responsive testimony of Drs. Lehr and Selwyn consisting of 80 pages of testimony and the responsive testimony of Mr. Baranowski consisting of 27 pages of testimony. The sponsors of these two pieces of testimony raise numerous specific issues related to the CPRO and BCAT cost models that require detailed responses. Given the breadth of the issues, it will be necessary for Mr. Copeland to exceed the 20 page rebuttal testimony limit.
- 3 Ms. Torrence is Qwest's only witness on transport issues. She is rebutting a total of 103 pages of responsive testimony filed by Messrs. Bennett, Fassett, Giovannucci and Stacy. In her rebuttal testimony she has tried to group issues to discuss them concisely. However, a full rebuttal of all of the

points raised by these witnesses requires a discussion of network architecture issues, the appropriate identification of trigger candidates, and the appropriate criteria to apply to determine whether a route meets the criteria. These issues will simply require more than 20 pages of testimony on rebuttal.

DATED this _____ day of February, 2004.

QWEST

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