

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In re Application of US WEST, INC. and)	
QWEST COMMUNICATIONS)	Docket No. UT-991358
INTERNATIONAL, INC.)	
)	
For an Order Disclaiming Jurisdiction, or in))	Answer of Level 3
the Alternative, Approving the US WEST,)	Communications, Inc. to Requests
INC. - QWEST COMMUNICATIONS)	of AT&T Communications of the Pacific
INTERNATIONAL, INC. Merger)	Northwest, Inc., NEXTLINK Washington,
)	Inc., Advanced TelCom, Inc. and
)	Northwest Payphone Association For
)	Continuance
)	
.....)	

Level 3 Communications, Inc. ("Level 3") supports the requests of AT&T Communications of the Pacific Northwest, Inc., NEXTLINK Washington, Inc., Advanced TelCom, Inc. ("Joint Intervenors") and the Northwest Payphone Association for a continuance of the date for filing of Staff, Public Counsel, and intervenor testimony. US WEST, Inc.'s and Qwest Communications International, Inc.'s ("Applicants") refusal to respond to numerous discovery requests makes it impossible for Level 3 as well as other parties to prepare and file testimony by November 22, 1999. Level 3 also agree's with Joint Intervenors that the Commission establish a date by which Applicants must provide responses to outstanding discovery requests and continue the testimony filing deadline until two weeks after that date.

Given that he Commission needs to schedule answers to the several pending motions to compel, it is unlikely the Applicants will respond in time to give Staff, Public Counsel, and intervenors the time necessary to review those responses and prepare testimony by November 22, 1999. And while Level 3 has not propounded discovery to date, it is evaluating outstanding discovery requests made by other parties in the preparation its testimony. Accordingly, Level 3

support's Joint Intervenors suggestion that the Commission set a date by which the Applicants must fully respond to the discovery subject to pending motions to compel, and to schedule the filing of testimony two weeks thereafter.

For the foregoing reasons, Level 3 supports the requests of Joint Intervenors and the Northwest Payphone Association to continue the case schedule adopted in this docket.

Respectfully submitted this 12th day of November, 1999.

NICHOLS & PEÑA, LPP

Rogelio E. Peña
Nichols & Peña, LPP
2060 Broadway, Suite 200
Boulder, Colorado 80302
(303) 442-4300
(303) 443-6764
repena@mcimail.com

CERTIFICATE OF SERVICE

Docket No. UT-991358

I hereby certify that on the date given below a copy of the Answer of Level 3 Communications, Inc. to Requests of AT&T Communications of the Pacific Northwest, Inc., NEXTLINK Washington, Inc., Advanced TelCom, Inc. and Northwest Payphone Association for Continuance in the above-referenced docket was sent via facsimile on this 12th day of November, 1999 and that the original and 19 copies of same were sent via Federal Express to:

Ms. Carole J. Washburn, Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

On the same date, true and correct copies were sent by regular first-class U.S. Mail, postage prepaid and/or sent via facsimile to designated parties indicated below (*), to:

Jeff Goltz Jonathan C. Thompson Attorney General's Office 1400 S. Evergreen Park Drive, SW P.O. Box 40128 Olympia, WA 98504 FAX: 360/586-5522 Phone: 360/664-1183	Lisa A. Anderl Senior Attorney US West Communications 1600 7 th Avenue, Suite 3206 Seattle, WA 98191 FAX: 206/343-4040 (*) e-mail: landerl@uswest.com
Gina Spade Hogan & Hartson, LLP 555 13 th Street, NW Washington, D.C. 20004 Counsel for Qwest Communications FAX: 202/637-5910 (*) e-mail: gspade@hhlaw.com	Simon ffitich Public Counsel Section Office of the Attorney General 900 Fourth Avenue, Suite 2000 Seattle, WA 98164-1012 FAX: 206/389-2058 (*)
Theresa Jensen Washington Regulatory Counsel US West Communications, Inc. 1600 7 th Ave., Room 3206 Seattle, WA 98191	Drake S. Tempest Executive Vice President Qwest Communications Intl. Inc. 555 17 th Street Denver, CO 80202

<p>Genevieve Morelli Senior Vice President of Gov't Affairs and Senior Associate General Counsel Qwest Communications Corp. 4250 North Fairfax Drive Arlington, VA 22203</p>	<p>James Van Nostrand Perkins Coie LLP 411 108th Avenue, NE Bellevue, WA 98004-5584 FAX: 425/453-7350</p>
<p>Wendy M. Moser Associate General Counsel U S West Communications 1801 California Street, Room 5100 Denver, CO 80202</p>	<p>Greg Bogus Metronet Services 800 Steward Street, Suite 300 Seattle, WA 98101</p>
<p>C. Scott McClellan US West Communications 1600 7th Avenue, Room 3204 Seattle, WA 98191</p>	<p>W. Clay Deanhardt Covad Communications 2330 Central Expressway Santa Clara, CA 95050 FAX: 408/844-7501</p>
<p>Sally G. Johnston Attorney General's Office 1400 S. Evergreen Park Drive, SW P.O. Box 40128 Olympia, WA 98504 FAX: 360/586-5522 (*)</p>	<p>Richard Finnigan 2405 Evergreen Park Drive, SW, Suite B-3 Olympia, WA 98502 Counsel for Washington Independent Telephone Assoc. Fax: 360/753-6862 (*)</p>
<p>David R. Conn McLeod USA Telecom. Services 6400 "C" Street, SW P. O. Box 3177 Cedar Rapids, IA 52406</p>	<p>Mark P. Trinchero Davis Wright Tremaine LLP 1300 SW Fifth Ave., Ste. 2300 Portland, Oregon 97201 503/778-5318 Fax: 503/778-5299 (*)</p>
<p>Ron Gayman AT&T Communications 1501 S. Capitol Way, Suite 204 Olympia, WA 98501-2200</p>	<p>Arthur Butler Ater, Wynne LLP 601 Union Street, Suite 5450 Seattle, WA 98101-2327 Counsel for SBC National, Inc. PHONE: 206/623-4711 FAX: 206/467-8406 (*)</p>
<p>Andrew O. Isar Director - State Affairs Telecommunications Resellers Assoc. 3220 Uddenberg Lane, Suite 4 Gig Harbor, WA 98335</p>	<p>Douglas H. Hsiao Assistant General Counsel Rhythms Links Inc. 7337 S. Revere Parkway, #100 Englewood, CO 80112 PHONE: 303/876-2704 FAX: 303/476-2272 e-mail: dhsiao@rhythms.net</p>

<p>Jeanne Stoller Northwest Payphone Assoc. P. O. Box 17727 Salem, OR 97305-7727</p>	<p>William P. Hunt, III Level 3 Communications 1025 Eldorado Blvd. Broomfield, CO 80021 FAX: 720/888-5134</p>
<p>Edward Eckhart SBC National, Inc. One Bell Plaza, Room 3611 Dallas, TX 75202</p>	<p>Angela Wu Ater, Wynn LLP 601 Union Street, Suite 5450 Seattle, WA 98101-2327 Counsel for Rhythms Links Inc. PHONE: 206/623-4711 FAX: 206/467-8406 (*)</p>
<p>Brooks E. Harlow Miller, Nash, Wiener, Hager & Carlson 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352 Counsel for Northwest Payphone Assoc. PHONE: 206/622-8484 FAX: 206/622-7485 (*)</p>	<p>Mary B. Tribby AT&T Law Department 1875 Lawrence Street, Suite 1500 Denver, CO 80202 FAX: 303/298-6301</p>
<p>Gregory J. Kopta Daniel M. Waggoner Davis Wright Tremaine, LLP 2600 Century Square 1501 Fourth Avenue Seattle, WA 98101-1688 Counsel for NEXTLINK FAX: 206/628-7699 (*)</p>	

DATED this 12th day of November, 1999.

Jennifer Powers