

Qwest

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*Via E-Mail, Facsimile,
and Overnight Delivery*

March 22, 2002

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

RE: Docket No. UT-003013, Part D

Dear Ms. Washburn:

This letter responds to the Commission's March 20, 2002 Notice Requesting Comments Regarding Defective Filing of Motions in Part D by WorldCom.

Qwest believes that the Commission should reject WorldCom's March 18 motions, as no other remedy or sanction exists that will have the impact of preserving parties' incentive to comply with Commission deadlines and filing requirements. To Qwest's knowledge, WorldCom has not shown exigent circumstances justifying its failure to comply with the Commission's March 14, 2002 Notice. Qwest acknowledges that parties, on occasion, require additional flexibility regarding Commission deadlines. In fact, Qwest consented to the extensions granted in the March 14 Notice. Qwest does not believe, however, the Commission's deadlines and filing requirements will remain meaningful if parties are permitted, without excuse and without penalty, to simply disregard these procedural mandates.

This letter is provided via facsimile pursuant to the March 20 Notice, which authorized fax filing. A hard copy will be delivered by overnight mail. Electronic copies will be provided via email and on a disk enclosed with the hard copy (Word 97 format).

Sincerely,

Adam L. Sherr

ALS/ilw

cc: Service List (via e-mail, facsimile, and U.S. Mail)