

BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Washington Utilities and Transportation Commission,)	
)	Docket No. UT-033011
)	
Complainant,)	GLOBAL CROSSING MOTION
)	TO ACCEPT LATE FILED
v.)	MOTION TO DISMISS OR FOR
)	SUMMARY DETERMINATION
Advanced TelCom, Inc., et al.)	
)	
Respondents.)	
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Global Crossing Local Services, Inc. (“Global Crossing”) hereby moves the Commission to accept its late-filed motion to dismiss, or alternatively to grant summary determination in favor of Global Crossing on, all claims against Global Crossing in the Commission’s Amended Complaint dated August 15, 2003. In support of this Motion, Global Crossing states as follows:

MOTION

1. The Prehearing Conference Order established a filing date for dispositive motions of November 7, 2003. The undersigned counsel was out of the office on sabbatical when the prehearing conference in this case was conducted. Upon his return, counsel did not understand from other members of his firm who participated in the prehearing conference that he was responsible for representing Global Crossing in this proceeding. Accordingly, the undersigned counsel did not prepare or file a dispositive motion on behalf of Global Crossing on the date it was due.

2. Upon learning of this mistake, the undersigned counsel immediately contacted Judge Rendahl, who proposed that Global Crossing file the instant Motion. Counsel also contacted counsel for Commission Staff who informed him that Staff has no objection to this Motion.

REQUEST FOR RELIEF

WHEREFORE, Global Crossing requests that the Commission grant the following relief:

- A. Acceptance of Global Crossing's late-filed dispositive motion; and
- B. Such other or further relief as the Commission finds fair, just, reasonable, and sufficient.

DATED this 10th day of November, 2003.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Global Crossing Local Services, Inc.

By _____
Gregory J. Kopta