

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

QWEST CORPORATION
Petition for Commission Approval of
Stipulation Regarding Certain
Performance Indicator Definitions and
Qwest Performance Assurance Plan
Provisions

DOCKET NO. UT-073034

QWEST'S MOTION TO CONVERT
PROCEEDING TO A SIX-MONTH
REVIEW AND TO VACATE THE
CURRENT SCHEDULE

- 1 Qwest Corporation ("Qwest") hereby moves the Commission to convert this proceeding to a six-month review proceeding under Section 16.1 of the QPAP and to vacate the current schedule, which calls for reply comments to be filed on October 26, 2007. Qwest further asks the Commission to convene a prehearing conference to determine, among other things: how and when to provide notice to potentially interested parties of their opportunity to participate; the development of an issues list for the converted proceeding; a schedule for the converted proceeding; and, whether there are other issues that should be discussed in connection with the conversion.
- 2 Qwest states that if the Commission grants this motion and converts the proceeding, Qwest will not assert that the timelines in Section 252(f) apply to the changes proposed in this docket through March 31, 2008.

3 Qwest is filing this motion in order to address the procedural concerns raised by Staff and the intervenors, particularly with regard to whether the Commission could, in the current docket, impose PID and QPAP changes on CLECs who are not parties to this docket, or on CLECs who are parties to this docket but who do not consent to the changes.

4 Qwest has discussed this motion with the other parties to this docket¹ and is authorized to represent that the CLEC parties do not object to the motion, and that with regard to the intervenors, conversion of the proceeding as requested herein would address the procedural issues they have raised. It is Qwest's understanding that Staff will make a separate filing setting forth its position.

5 Qwest therefore requests that the Commission grant this motion, convert this docket as set forth herein, vacate the current schedule, and schedule a prehearing conference to discuss the issues raised by conversion.

DATED this 18th day of October, 2007.

QWEST

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¹ Eschelon Telecom, Inc. ("Eschelon"), DIECA Communications, Inc. d/b/a Covad Communications Company ("Covad") and McLeodUSA Telecommunications Services, Inc. ("McLeodUSA") are parties to the stipulation with Qwest that is at issue for approval in this case. Time Warner Telecom and XO are intervenors. Commission Staff is also participating as a party in this case.