

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Petition of Qwest Corporation for)	
Forbearance Pursuant to 47 U.S.C.)	
Section 160(c) in the Denver,)	WC Docket No. 07-97
Minneapolis-St. Paul, Phoenix,)	
And Seattle Metropolitan Statistical)	
Areas)	

**REQUEST FOR EXTENSION OF TIME OF THE ARIZONA CORPORATION
COMMISSION TO FILE COMMENTS AND REPLY COMMENTS ON
QWEST’S PETITION FOR FORBEARANCE**

On April 27, 2007, Qwest Corporation (“Qwest”) filed four petitions pursuant to Section 10 of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (“1996 Act”)(collectively the “Act”), requesting that the Commission forbear from applying certain regulatory obligations to Qwest in the Denver, Minneapolis-St. Paul, Phoenix, and Seattle Metropolitan Statistical Areas (“MSAs”). Qwest is seeking relief from the following regulatory obligations in Phoenix and the other markets: 1) forbearance from loop and transport unbundling obligations pursuant to sections 251(c) and 271(c)(2)(B)(ii) of the Act, and section 51.319(a), (b) and (c) of the FCC’s rules; 2) for mass market and enterprise services, forbearance from Part 61 dominant carrier tariffing requirements; Part 61 price cap regulation; Computer III requirements, including CEI and ONA requirements; dominant carrier requirements arising under section 214 of the Act and Part 63 of the FCC’s rules concerning the processes for acquiring lines, discontinuing services, assignment or transfers of control and acquiring affiliations.

On June 1, 2007, the Commission issued a Public Notice which set a deadline of July 17, 2007, to file comments on Qwest’s petition and a deadline of August 16, 2007, to file reply comments. The Arizona Corporation Commission (“Arizona Commission”)

is the State agency with authority over the provision of telecommunications services in Arizona. Qwest's petition is likely to have a significant impact upon the state of competition and the provision of telecommunications services in Arizona. As such, the Arizona Commission desires to file both comments and reply comments in this proceeding.

The Arizona Commission has just sent out data requests to all facilities based telecommunications providers in Arizona. The Arizona Commission has also sent data requests to Cox Arizona Telcom ("Cox") and Qwest. Certain of the providers are seeking extensions of time to respond to the requests and are seeking to enter into an additional protective agreement with the Arizona Commission. Qwest has also agreed to provide certain information to the Arizona Commission subject to a protective agreement which still is to be worked out between the parties. The Arizona Commission has contacted the FCC's General Counsel's Office about obtaining a copy of the unredacted Order granting Qwest forbearance relief in the Omaha metropolitan statistical area, released on December 2, 2005; since this Order may have some impact upon the outcome of this proceeding. The Arizona Commission anticipates that simply obtaining the information discussed above and agreeing upon the terms of further protective agreements will involve considerable time.

The Arizona Commission must then analyze the data and prepare comments in response to Qwest's petition. The comments must then go through the Arizona Commission's own internal processes, similar to those of the FCC. The Arizona Commission has a small staff and it will be difficult if not impossible for it to obtain the data it needs and prepare meaningful comments in the time period presently allotted by the FCC. The Arizona Commission, therefore, respectfully requests a 45 day extension of time to file its comments, and a corresponding extension of time to file reply comments in this proceeding.

We believe that the public interest will be served by giving the Arizona Commission and other parties the additional time requested. The Arizona Commission has oversight authority over the provision of telecommunications in the Phoenix MSA, and thus its comments should be of significant benefit to the Commission's analysis of the issues presented by Qwest's petition. As the Commission has found in other instances, we believe that the additional time will enable the Commission to obtain a more complete and well-developed record in this proceeding. The Arizona Commission believes that other parties both in Arizona and in the other jurisdictions in which Qwest seeks forbearance authority, will benefit from the additional time as well.

WHEREFORE, the Arizona Commission respectfully requests an additional 45 days to file its comments, and a corresponding extension of time to file reply comments in this proceeding.

RESPECTFULLY submitted this 28th day of June, 2007.

/s/ Maureen A. Scott

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