

**BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation Into)
U S WEST Communications, Inc.'s) Docket No. UT-003022
Compliance With Section 271 of the)
Telecommunications Act of 1996)
_____)

In the Matter of U S WEST Communications,) Docket No. UT-003040
Inc.'s Statement of Generally Available)
Terms Pursuant to Section 252(f) of the)
Telecommunications Act of 1996)
_____)

**MOTION FOR LEAVE TO RESPOND TO QWEST'S COMPLIANCE FILING
MODIFYING QWEST'S SGAT TO ADOPT COLLOCATION PROVISIONING
INTERVALS SET BY THE FCC**

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Oregon and TCG Seattle ("AT&T") hereby move the Washington Utilities and Transportation Commission (the "Commission") for leave to respond to Qwest Corporation's ("Qwest") revision concerning collocation intervals as described in the recently submitted Compliance Filing Modifying Qwest's SGAT to Adopt Collocation Provisioning Intervals Set By the FCC ("Compliance Filing"). The grounds in support of this motion are as follows:

1. By way of its Compliance Filing, Qwest asks for Commission approval to modify, under operation of law, the provisions of Qwest's Statement Of Generally Available Terms ("SGAT") pertaining to the time limits for accomplishing physical collocation.

2. The operation-of-law revision sought by Qwest depends on what the law is as to the time limits in question. As to the appropriate time limits, Qwest sets forth its own legal contentions that are based on Qwest's interpretation of two FCC orders.¹

3. Qwest further argues that there exist certain circumstances that will allow Qwest to exceed the time limits prescribed by the FCC.

4. It would be helpful to the Commission if AT&T were permitted an opportunity to file a response to Qwest's proposed SGAT revision, legal contentions, interpretations of FCC orders, and arguments. AT&T's response would assist the Commission in determining the nature and extent of a proper SGAT revision pertaining to the time limits for provisioning of physical collocation. Because many of the arguments are legal in nature, a written filing in response to Qwest's written filing makes more sense than trying to respond to all issues orally during scheduled workshops. The Commission should also allow any other party desiring to respond an opportunity to do so.

5. Due to existing commitments in SGAT and Section 271 proceedings involving Qwest, AT&T requests through and including December 18, 2000, in which to prepare and file its response.

WHEREFORE, AT&T moves that the Commission issue an order (1) that grants leave for AT&T to file, on or before December 18, 2000, a response to Qwest's revision

¹ See *Deployment of Wireline Services Offering Advanced Telecommunications and Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, Order on Reconsideration and Second Further Notice of Proposed Rulemaking in CC docket No. 98-147 and Fifth Further Notice of Proposed Rulemaking in CC Docket No. 96-98, FCC 00-297 (rel. Aug. 10, 2000) ("*Order on Reconsideration*" or "*Order*"), as amended by Memorandum Opinion and Order, FCC 00-2528 (rel. Nov. 7, 2000) ("*Amended Order*").

concerning collocation, and (2) that allows any other party an opportunity to file a response on or before December 18, 2000.

Respectfully submitted this 28th day of November, 2000.

AT&T COMMUNICATIONS
OF THE PACIFIC NORTHWEST, INC.
AND AT&T LOCAL SERVICES ON
BEHALF OF TCG OREGON AND TCG
SEATTLE

By: _____

Mary B. Tribby
Steven H. Weigler
AT&T Law Department
1875 Lawrence Street, Suite 1575
Denver, CO 80202
(303) 298-6957