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June 21, 2010

**VIA ELECTRONIC FILING & ABC LMI**

David Danner  
Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: In the Matter of the Joint Application of  
QWEST COMMUNICATIONS INTERNATIONAL INC. AND CENTURYTEL, INC.  
For Approval of Indirect Transfer of Control of Qwest Corporation, Qwest  
Communications Company LLC, and Qwest LD Corp.  
Docket No. UT-100820

Dear Mr. Danner:

Enclosed please find the original and twelve (12) copies of Public Counsel Objection and Motion  
Regarding Schedule and Certificate of Service for filing in the above-entitled docket.

Sincerely,

Simon J. Ffitch  
Senior Assistant Attorney General  
Public Counsel  
(206) 389-2055

SJf:mh  
Enclosure

cc: Service List (First Class Mail & E-mail)  
Marguerite E. Friedlander, ALJ (E-mail)

2010 JUN 22 AM 10:00  
STATE OF WASHINGTON  
OFFICE OF THE ATTORNEY GENERAL  
COMMUNICATIONS SECTION



**CERTIFICATE OF SERVICE**

**Docket No. UT-100820**

I hereby certify that a true and correct copy of the Public Counsel Objection and Motion Regarding Schedule was sent to each of the parties of record shown on the attached Service List in sealed envelopes, via:

First Class Mail and Electronic Mail

**SERVICE LIST**

**\*\* = Receive Highly Confidential**

**\* = Receive Confidential**

**NC = Receive Non-Confidential**

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COMCAST:**

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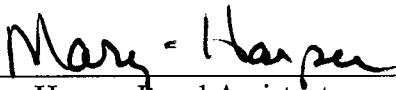
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DATED: June 21<sup>st</sup>, 2010.

  
\_\_\_\_\_  
Mary Harper, Legal Assistant

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application  
of

QWEST COMMUNICATIONS  
INTERNATIONAL INC. AND  
CENTURYTEL, INC.

For Approval of Indirect Transfer of  
Control of Qwest Corporation, Qwest  
Communications Company LLC, and  
Qwest LD Corp.

DOCKET NO. UT-100820

PUBLIC COUNSEL OBJECTION  
AND MOTION REGARDING  
SCHEDULE

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RECEIVED  
PUBLIC COUNSEL

**I. OBJECTION AND MOTION REGARDING SCHEDULE**

1. Pursuant to WAC 480-07-430, WAC 480-07-810, and Order 02, ¶ 24 (Prehearing Conference Order), Public Counsel files this objection as to one date in the schedule adopted for this case. Public Counsel respectfully requests the schedule be amended to move the date for filing and distribution of cross-examination exhibits to December 29, 2010, or, in the alternative to another date closer to the hearing, no earlier than December 17.

**II. MEMORANDUM**

2. Order 02 establishes December 6, 2010, as the date for distribution of cross-examination exhibits, approximately one month prior to the hearing, set to begin on January 5, 2010. This is significantly farther in advance of the hearing date than past Commission practice, which has ordinarily set the cross-exhibit exchange date for the week prior to the hearing. This presents a hardship for Public Counsel, and we believe other parties, because it reduces substantially the

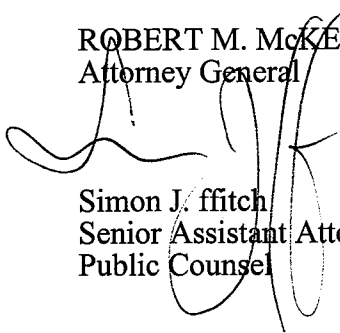
amount of time for completion of discovery and for hearing preparation. With the current date, parties would be required to finalize plans for cross-examination and related exhibits, major components of hearing preparation, more than one month in advance of the hearing. However, in many cases in the late stages, positions are modified, issues are still developing, the rebuttal case is still being analyzed, and final rounds of discovery are under way. As a result, the later exhibit exchange date has benefits for parties in terms of preparing the most complete and up-to-date hearing submission for the Commission, which in turn should yield a better record for decision.

3. Accordingly, Public Counsel respectfully requests that the date for exchange of cross-exhibits be amended to December 29, 2010, the week prior to the evidentiary hearing. Public Counsel recognizes that the holiday season is a potential issue with the case schedule, and recommends as an alternative, a date no earlier than December 17, if December 29 is not a feasible date.

Respectfully submitted,

DATED this 21<sup>st</sup> day of June, 2010.

ROBERT M. McKENNA  
Attorney General



Simon J. Ffitch  
Senior Assistant Attorney General  
Public Counsel