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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T Communications of the Pacific)	
Northwest, Inc.,)	DOCKET NO. UT-003120
)	
Complainant,)	QWEST’S MOTION FOR LEAVE TO
)	FILE A REPLY
vs.)	
)	
Qwest Corporation,)	
)	
Respondent.)	

Pursuant to the provisions of WAC 480-09-425(3)(b), Qwest Corporation (“Qwest”) hereby requests permission to file a reply to AT&T’s January 11, 2001 Response to Qwest’s motion. In accordance with that rule, Qwest has attached its proposed reply to this request.

WAC 480-09-425(3)(b) states that requests for permission to file a reply to an answer should address whether the answer raises new material requiring response, or other reason why a reply is necessary. WAC 480-09-420(9)(b) requires a showing of cause before a reply will be authorized by the Commission.

Qwest believes that good cause exists for filing a reply, and that AT&T’s answer raises new material requiring response. The issues to be addressed include AT&T’s request for

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expanded emergency relief and AT&T's failure to rebut the factual allegations in Qwest's motion.

Qwest believes that it is necessary to file a brief reply on those issues.

Respectfully submitted this 17th day of January, 2001.

Qwest Corporation

Lisa A. Anderl, WSBA No. 13236