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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Request for Competitive Classification
of Basic Business Exchange Telecommunications
Services

Docket No. UT-030614

**QWEST CORPORATION'S RESPONSE
TO COMMISSION STAFF'S MOTION
TO MODIFY SCHEDULE**

Qwest Corporation ("Qwest"), by and through its undersigned attorneys, hereby responds to Staff's July 25, 2003 motion to modify the procedural schedule in the above-captioned case. This response is provided pursuant to the Commission's July 28, 2003 notice.

Qwest does not oppose Staff's request for a brief extension of the August 6, 2003 testimony deadline so long as Qwest is provided sufficient time to conduct discovery and prepare its rebuttal testimony.

In its motion, Staff proposed a revised direct testimony date for Staff, Public Counsel and Intervenors of August 13, 2003. Qwest believes a one week extension until August 13 is appropriate under the circumstances described in Staff's motion and Mr. Wilson's declaration. Staff also proposed two possible rebuttal testimony dates: August 29, 2003 or September 3, 2003. Qwest believes the September 3 date would be appropriate as the August 29 date would prejudice and impede Qwest's

1 ability to conduct discovery on the other parties' direct testimony and prepare its rebuttal testimony in the
2 time allotted. The September 3 deadline would preserve the 14 business day interim between the other
3 parties' direct testimony and rebuttal. The August 29 deadline would shorten the interim to only 9
4 business days. Given the 7 business day discovery timeline operative in this case, a 9 day period to read
5 testimony from numerous other parties, propound discovery, receive responses and prepare rebuttal
6 testimony is unworkable. By contrast, the other parties will by August 13 have had 30 business days
7 since Qwest filed its direct testimony to conduct discovery and prepare their testimony.
8
9

10 DATED this ____ day of July, 2003.

11
12 QWEST CORPORATION

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