

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

WASHINGTON UTILITIES AND)	
TRANSPORTATION COMMISSION,)	DOCKET NO. UT-033011
)	
Complainant,)	
)	
v.)	ANSWER OF ESCHELON
)	TELECOM OF WASHINGTON,
ADVANCED TELECOM GROUP, INC.; ET AL.)	INC. TO QWEST'S MOTION
)	TO COMPEL
Respondents.)	
)	

Eschelon Telecom of Washington, Inc. (Eschelon) files this Answer to Qwest Corporation's (Qwest's) Motion to Compel Responses to Data Requests to Staff. Eschelon supports Qwest's Motion. Eschelon agrees that an understanding of Staff's interpretation of the laws and the agreements is crucial to formulating a response to Staff's testimony and to mounting a defense in this matter. A ruling on this Motion is also important to the ability of Eschelon to pursue certain lines of questioning at the deposition of Staff's Witness Wilson, currently scheduled for July 21-22, 2004.

For these reasons, and the reasons stated by Qwest in its Motion, Eschelon supports Qwest's Motion to Compel.

Respectfully submitted,

July 19, 2004

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