

BEFORE THE WASHINGTON

UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Frontier Communications
Northwest Inc.'s Petition to be Regulated as a
Competitive Telecommunications Company
Pursuant to RCW 80.26.320

Docket No. UT- 121994

JOINT MOTION OF FRONTIER AND CLEC
INTERVENORS FOR LEAVE TO FILE
NARRATIVE AND TESTIMONY IN
SUPPORT OF SETTLEMENT AGREEMENT

Frontier Communications Northwest, Inc. ("Frontier"), Cbeyond Communications LLC, Integra Telecom of Washington, Inc., tw telecom of Washington, llc, Level 3 Communications LLC and Charter Fiberlink WA-CCVII, LLC (collectively "CLEC Intervenors") make this joint motion requesting leave to file materials in support of a settlement on April 25, 2013, for the reason set forth below.

1. Frontier and the CLEC Intervenors have achieved a settlement of the issues of concern to CLEC Intervenors. A copy is attached hereto (the "Settlement"); copies of the Settlement have already been shared with the non-signatory parties in this proceeding. As a consequence of the Settlement, the CLEC Intervenors will not oppose Frontier's Petition in this case, and both the CLEC Intervenors and Frontier plan to file narratives and testimony in support of this Settlement.
2. According to the procedural schedule in this case, as modified on April 5, 2013, responsive testimony by Commission Staff, Public Counsel, and Intervenors is due on April 25, 2013. The procedural schedule does not appear to contemplate anything being filed by Frontier on that date, nor the filing by Intervenors of the other materials in support of a settlement called for by WAC 480-07-740(2)(a) and (b).

3. Frontier and CLEC Intervenors respectfully submit that in order to fully develop the record in this case, the narrative and prefiled testimony called for by WAC 480-07-740 should be filed prior to May 14, 2013, the next date on the existing procedural schedule for the filing of testimony.
4. Frontier and CLEC Intervenors therefore request leave to also file materials in support of the Settlement on April 25, 2013.

Respectfully submitted this 17th day of April, 2013.



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