

August 12, 2011

**NOTICE OF OPPORTUNITY TO RESPOND TO MOTION FOR
TEMPORARY RELIEF AND REQUEST FOR ORAL ARGUMENT
(Responses due by Thursday, August 18, 2011, 3:00 p.m.)**

RE: *Advanced Telecom, Inc. d/b/a Integra; Electric Lightwave, LLC d/b/a Integra; Eschelon Telecom of Washington, Inc. d/b/a Integra Telecom; Oregon Telecom Inc. d/b/a Washington Telecom d/b/a Integra; Unicom f/k/a United Communications, Inc. d/b/a Integra; McLeodUSA Telecommunications Services L.L.C. d/b/a PAETEC Business Services; and tw telecom of washington llc, Complainants, v. Qwest Corporation and CenturyLink, Inc., Respondents, Docket UT-111254*

TO PARTIES OF RECORD:

On August 11, 2011, Advanced Telecom, Inc. d/b/a Integra; Electric Lightwave, LLC d/b/a Integra; Eschelon Telecom of Washington, Inc. d/b/a Integra Telecom; Oregon Telecom Inc. d/b/a Washington Telecom d/b/a Integra; Unicom f/k/a United Communications, Inc. d/b/a Integra; McLeodUSA Telecommunications Services L.L.C. d/b/a PAETEC Business Services; and tw telecom of washington llc (collectively, Joint CLECs) filed with the Washington Utilities and Transportation Commission (Commission) a motion for temporary injunctive relief against Qwest Corporation and CenturyLink, Inc. (CenturyLink). Specifically, Joint CLECs request that the Commission order that CenturyLink suspend further implementation and integration of MTG, a new maintenance and repair Operational Support System (OSS) to replace the legacy OSS.¹ Joint CLECs assert that time is of the essence to enjoin CenturyLink from replacing the legacy OSS during the pendency of this docket, since as Joint CLECs contend, “the harm that the Joint CLECs brought this action to prevent will occur.”² Joint CLECs also ask for the opportunity to present

¹ Joint CLECs’ Motion for Temporary Relief and Request for Oral Argument at 4.

² *Id.* at 27.

oral arguments in support of their Motion at the prehearing conference scheduled for August 25, 2011.³

Pursuant to WAC 480-07-375(4), responses to written motion are due within five business days after the motion is served. If any party wishes to respond to the Joint CLECs' Motion, they should do so by **August 18, 2011, at 3:00 p.m.**

If you have any questions, please contact Marguerite E. Friedlander, at 360-664-1285, or by e-mail at mfriedla@utc.wa.gov.

Sincerely,

MARGUERITE E. FRIEDLANDER
Administrative Law Judge

³ *Id.* at 28.