

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Investigation into
U S WEST Communications, Inc.'s
Compliance with § 271 of the
Telecommunications Act of 1996

Docket No. UT-003022

In the Matter of U S WEST
Communications, Inc.'s Statement of
Generally Available Terms Pursuant to
Section 252(f) of the Telecommunications
Act of 1996

Docket No. UT-003040

**QWEST'S REPLY TO AT&T's
MOTION TO STRIKE PORTIONS OF
QWEST'S BRIEF DATED FEBRUARY
16, 2001**

Qwest Corporation (“Qwest”), formerly U S WEST Communications, Inc., hereby submits this reply to the Washington Utilities and Transportation Commission (“Commission”) in response to AT&T’s Motion to Strike Portions of Qwest’s Legal Brief Regarding Disputed Workshop # 2 Issues: Checklist Item 1 – Collocation, dated February 16, 2001.

In its Motion to Strike, AT&T requested that the discussion contained in Qwest’s collocation brief, subsection C beginning on page 9, i.e., “Switched Access Charges Should Apply To Phone-To-PhoneVoice Over Internet Protocol” (WA –I- 68 and WA 1-69; SGAT §§ 4.39 and 4.57) be stricken and considered no further.

Qwest regrets any misunderstanding concerning the inclusion of issues concerning Section 4 of the SGAT in our brief on collocation. As a practical matter, we do not believe that

the parties have been prejudiced in any way by their inclusion. However, rather than require a formal ruling from the administrative law judge on the matter, we will agree not to contest AT&T's motion as the issue of Phone-to-Phone Telephony is probably best dealt with elsewhere. Qwest will agree to remove it from the SGAT. By so agreeing, however, Qwest does not waive any rights it may have in other contexts to contest any efforts by CLECs to avoid switched access charges.

Respectfully submitted this 5th day of March, 2001.

Qwest Corporation

/s/ Charles W. Steese

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