

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

QWEST CORPORATION,

Complainant,

v.

LEVEL 3 COMMUNICATIONS, LLC;  
PAC-WEST TELECOMM, INC.;  
NORTHWEST TELEPHONE INC.;  
TCG-SEATTLE; ELECTRIC  
LIGHTWAVE, LLC; ADVANCED  
TELCOM GROUP, INC. D/B/A  
ESCHELON TELECOM, INC.;  
BROADWING COMMUNICATIONS,  
LLC; GLOBAL CROSSING LOCAL  
SERVICES INC; AND, MCIMETRO  
ACCESS TRANSMISSION SERVICES  
LLC D/B/A VERIZON ACCESS  
TRANSMISSION SERVICES,

Respondents.

Docket No. UT-063038

QWEST CORPORATION'S MOTION  
FOR LEAVE TO FILE REPLY TO  
RESPONSE OF COMMISSION STAFF  
TO QWEST AND VERIZON'S  
PROPOSED PARTIAL SETTLEMENT

1 Qwest Corporation ("Qwest") hereby requests leave to file a reply to the Response of Commission Staff to Qwest and Verizon's Proposed Partial Settlement ("Staff Response"). The Staff Response is in essence an answer to Qwest's and Verizon's motion for approval of the proposed partial settlement. Under Commission rules, no party may file a reply to an answer without first requesting permission to do so. *WAC 480-07-370(1)(d)*. Qwest's proposed reply is included with this filing.

2 In accordance with the rule, Qwest states that a reply is necessary to address new issues raised by Staff. Staff has asserted in its response that Qwest's proposed settlement should be treated as Qwest's revised litigation position, an assertion with which Qwest disagrees.

DATED this 23rd day of March, 2007.

QWEST

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