

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

<p>In The Matter Of</p> <p>Level 3 Communications, LLC'S Petition for Arbitration Pursuant to Section 252(B) of the Communications Act of 1934, as Amended by The Telecommunications Act Of 1996, and the Applicable State Laws for Rates, Terms, and Conditions of Interconnection with Qwest Corporation</p>	<p>Docket No. UT-063006</p> <p>QWEST CORPORATION'S MOTION FOR LEAVE TO FILE A REPLY TO LEVEL 3'S RESPONSE TO QWEST'S PETITION FOR REVIEW</p>
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- 1 Qwest Corporation (“Qwest”) hereby requests leave to file a reply to Level 3’s Response to Qwest’s Petition for Review (“Level 3 Response”). The Level 3 Response is in essence an answer to Qwest’s Petition for Review. Under Commission rules, to the extent applicable to this proceeding, 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 correct inaccuracies and misstatements in the Level 3 Response.

3 Qwest did not previously seek leave to file a reply because Qwest intended to correct the inaccuracies during oral argument, previously scheduled for May 24, 2007. The Commission cancelled oral argument, which had been requested and supported by both parties, on May 22, 2007. Qwest relied on the procedural schedule in this matter and believed that oral argument gave it sufficient procedural due process so that it was, to this point, unnecessary to request a reply. Indeed, had the parties had notice that oral argument would not be permitted, Qwest would likely have requested a different procedural schedule, and possibly would have specifically requested that replies be built in to the schedule. However, now that the argument has been cancelled on the Commission's own motion, without request or consent of the parties, Qwest believes it is critical that the information contained in the accompanying reply be considered.

DATED this 25th day of May, 2007.

QWEST

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