

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T CORPORATION and AT&T
COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC.,

Complainants,

vs.

QWEST CORPORATION,

Respondent.

Docket No. UT-041394

QWEST CORPORATION'S MOTION FOR
LEAVE TO FILE AN AMENDED ANSWER

- 1 Respondent Qwest Corporation ("Qwest") respectfully moves the Commission for leave to file an amended answer in this matter. The amended answer is attached hereto. In that amended answer, Qwest has added text to footnote 9, and has added paragraph 42. These amendments have been necessitated by additional information Qwest has received in discovery from the Complainants, and all pertain to the applicability of RCW 80.54.070 to this proceeding.
- 2 Pursuant to WAC 480-07-395(5), the Commission may allow amendments to pleading, motions or other documents on such terms as promote fair and just results. Qwest believes that no party will be prejudiced by allowing it to amend and clarify its answer with regard to the applicability of a particular provision of the law, and that it promotes the efficiency of the

proceeding to have the parties' positions on such matters stated timely and with clarity. Thus, Qwest asks the Commission to grant its motion and to accept the attached amended answer to the complaint.

RESPECTFULLY SUBMITTED this 21st day of December, 2004.

QWEST

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