



500 IDS CENTER
30 SOUTH EIGHTH STREET
MINNEAPOLIS, MN 55402-3796
MAIN: 612.632.3000
FAX: 612.632.4444

GREGORY R. MERZ
ATTORNEY
DIRECT DIAL: 612.632.3257
DIRECT FAX: 612.632.4257
GREGORY.MERZ@GPMLAW.COM

May 21, 2007

Carole J. Washburn
Washington Utilities and Transportation
1300 South Evergreen Park Drive SW
P.O. Box 47520
Olympia, WA 98504

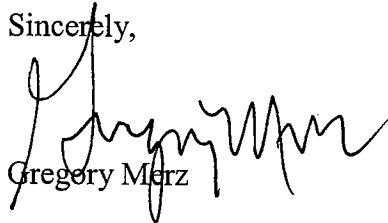
Via FedEx

Re: In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon, Inc.
Pursuant to 47 U.S.C. § 252 of the Federal Telecommunications Act of 1996
Docket No. UT-063061

Dear Ms. Washburn:

Enclosed for filing in the above-captioned matter please find the original and eight copies of Eschelon Telecom of Washington, Inc.'s Motion for Extension of Page Limitations, along with the Certificate of Service.

Sincerely,



Gregory Merz

GRM/jlp

Enclosures

cc: hard copy & email

cc: via email only

Lisa.Anderl@qwest.com
Maura.Peterson@qwest.com
Mark.Reynolds3@qwest.com
Mary.Neill@qwest.com
Jason.Topp@qwest.com
Dianne.Barthel@qwest.com
JDevaney@perkinscoie.com

GP:2182767 v1

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

In the Matter of the Petition of Qwest
Corporation for Arbitration with
Eschelon Telecom, Inc., Pursuant to 47
U.S.C. Section 252 of the Federal
Telecommunications Act of 1996

Docket No. UT-063061

**ESCHELON TELECOM OF
WASHINGTON, INC.'S MOTION FOR
EXTENSION OF PAGE LIMITATIONS**

Eschelon Telecom of Washington, Inc. (“Eschelon”) respectfully requests an extension of the page limitations for briefs imposed by WAC 480-07-396 from sixty (60) pages to (150) one hundred fifty pages for Eschelon’s post-hearing brief.¹ In light of the number of issues for decision and the extensive factual record in this case, Eschelon believes that an extension of the page limit will allow it to provide a brief that will be more helpful to the Administrative Law Judge and the Commission in their consideration of the issues by giving Eschelon an adequate opportunity to address the large amount of evidence that has been presented in this case. Eschelon would, as it has in arbitration proceedings in other states, provide a brief that is heavily annotated with citations to the record where the evidentiary support for its positions may be found, thus assisting the ALJ and the Commission in their evaluation of the evidence. In order to meet the sixty page limit provided for by the rule, Eschelon would almost certainly have to greatly reduce the number of footnotes, which would make the brief less useful.

There is precedent in Washington for granting an extension of briefing page limits in more complex cases. In particular, in a recent cost docket involving Verizon, the Commission granted Verizon’s request for leave to file a 125 page opening brief, stating that, “The Commission’s primary concern in granting an extension is to obtain briefs that will assist it in reaching a decision.”² In that case, the parties filed over 1,750 pages of

¹ Eschelon has no objection to a similar extension being granted to Qwest.

² *In the Matter of the Review of Unbundled Loop and Switching Rates; the Deaveraged Zone Rate*

testimony with 115 exhibits.³ The record in this case is more extensive. There are thirty six open issues in this case, many of which include or more sub-issues.⁴ The parties have filed 2,218 pages of testimony with 130 exhibits. Moreover, in this case, the parties have not requested an opportunity to file reply briefs, so, if Eschelon's motion is granted, Eschelon's brief will still be shorter than the total amount of briefing filed by Verizon in the cost case. As in the Verizon case, an extension of the page limits for briefing will assist the Commission in reaching a decision.

For these reasons, Eschelon respectfully request that the Commission grant it leave to file a post-hearing brief not to exceed 125 pages in length.

Dated: May 21, 2007

By:



Gregory Metz
Gray, Plant, Mooty, Mooty & Bennett
500 IDS Center
80 South Eighth Street
Minneapolis, MN 55402
Telephone: 612 632 3257
Facsimile: 612 632 4257
(admitted pro hac vice)

Karen L. Clauson
Senior Director of Interconnection/
Associate General Counsel
Eschelon Telecom, Inc.
730 2nd Ave. South, Suite 900
Minneapolis, MN 55402
Telephone: 612-436-6026
Facsimile: 612-436-6816
(admitted pro hac vice)

COUNSEL FOR ESCHELON TELECOM OF WASHINGTON, INC.

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Structure; and Unbundled Network elements, Transport and Termination, Docket No. UT-023003, Notice of Ruling on Motion to Extend Page Limitations for Briefs (July 2, 2004).

³ *Id.*

⁴ This does not count the wire center issues, which are scheduled for further evidentiary proceedings.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of Qwest Corporation for Arbitration with Eschelon Telecom, Inc., Pursuant to 47 U.S.C. Section 252 of the Federal Telecommunications Act of 1996

Docket No. UT-063061

CERTIFICATE OF SERVICE

I hereby certify that an original and eight copies of Eschelon Telecom of Washington, Inc.'s Motion for Extension of Page Limitations was filed via FedEx on May 21, 2007, with:

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
Olympia, WA 98504-7250


Copies were also served via e-mail on May 21, 2007, upon the following parties:

Lisa.Anderl@qwest.com
Maura.Peterson@qwest.com
Mark.Reynolds@qwest.com
Mary.Neill@qwest.com
Jason.Topp@qwest.com
Dianne.Barthel@qwest.com
JDevaney@perkinscoie.com

In addition, a copy was served May 21, 2007 via FedEx upon:

Lisa Anderl
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle, WA 98191

Dated: May 21, 2007


Joyce L. Pedersen