

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF:

LEVEL 3 COMMUNICATIONS LLC INC.'S
PETITION FOR ENFORCEMENT OF
INTERCONNECTION AGREEMENT WITH
QWEST CORPORATION

DOCKET NO. UT-053039

PAC-WEST TELECOMM, INC.

Petitioner,

v.

QWEST CORPORATION,

Respondent.

DOCKET NO. UT-053036

QWEST'S MOTION FOR LEAVE TO FILE A
REPLY TO RESPONSE OF LEVEL 3 AND
PAC-WEST RE MOTIONS TO AMEND

I Qwest Corporation ("Qwest") hereby files this Motion for Leave to File a Reply to the Response filed by Level 3 and Pac-West on June 28, 2012 in opposition to Qwest's motions to amend its answers and counterclaims.¹

¹ The Response was electronically filed on June 28, 2012. Pac-West and Level 3 have stated that counsel for Qwest were provided an electronic copy that same day, but undersigned counsel have no record of receiving that e-mail. After discussion, counsel for Pac-West and Level 3 have stated that they would not object to the timeliness of this filing (July 10,

- 2 Qwest submits this response to correct several arguments made by Level 3 and Pac-West that are legally and/or factually wrong, and to address new issues raised by the filing of affidavits and arguments of prejudice.

DATED this 10th day of July, 2012.

QWEST



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2012), which is 5 business days after Qwest received the hard copy of the Response via U. S. Mail.