BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

)

PAC-WEST TELECOMM, INC.,	ý	DOCKET UT-053036
Petitioner,)	
v.)	
QWEST CORPORATION,)	
Respondent.)	
LEVEL 3 COMMUNICATIONS, LLC,)	DOCKET UT-053039
Petitioner,)	
V.)	
QWEST CORPORATION,)	
Respondent.)	

REQUEST FOR ORAL ARGUMENT

On June 21, 2012, Qwest Corporation ("Qwest") filed its Memorandum in Opposition to Motion of Level 3 Communications, LLC ("Level 3") and Pac-West Telecomm, Inc. ("Pac-West") for Summary Determination. Qwest also filed, on that date, a Motion to Amend Answer and Counterclaims, in order to assert claims for past access charges. Level 3 and Pac-West filed their Response to Qwest's Motion to Amend on June 28, 2012. On July 10, 2012, Qwest filed a Motion for Leave to File a Reply to the Level 3 and Pac-West Response to Qwest's Motion to Amend, to which Qwest attached its proposed Reply.

Level 3 and Pac-West have no objection to Qwest's Motion for Leave to File a Reply or to the filing of the Reply that Qwest attached to its motion papers. Level 3 and Pac-West, however, continue to oppose Qwest's Motion to Amend. Given the impact that any Commission decision on the Motion to Amend could have on the scope of this proceeding, Level 3 and Pac-West respectfully request that the Commission or the Administrative Law Judge hear oral argument on Qwest's Motion to Amend. Mr. Butler is out of the country until July 23, 2012. However, Level 3 and Pac-West request that argument be scheduled as soon as possible thereafter, given that prefiled testimony is due in these proceedings on September 5, 2012.

Lisa F. Rackner McDowell, Rackner & Gibson, PC 419 SW Eleventh Avenue, Suite 400 Portland, OR 97205 Tel: (503) 595-3925 Fax: (503) 595-3928 Email: <u>lisa@mcd-law.com</u>

Counsel for Level 3 Communications, LLC

July 12, 2012

Respectfully submitted,

Arthur Å. Butler Ater Wynne, LLP 601 Union Street, Suite 1501 Seattle, WA 98101 Tel: (206) 623-4711 Fax: (206) 467-8406 Email: aab@aterwynne.com

Counsel for Pac-West Telecomm, Inc.