

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

QWEST CORPORATION,

Complainant,

v.

LEVEL 3 COMMUNICATIONS, LLC;
ET AL.,

Respondents.

DOCKET NO. UT-063038

PAC-WEST'S MOTION TO EXTEND DATE
TO FILE REPLIES TO ANSWERS TO
PETITIONS FOR REVIEW

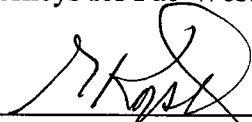
1. Pursuant to WAC 480-07-375, 480-07-385, and 480-120-875(5)(c), Pac-West Telecomm, Inc. ("Pac-West") requests that the current filing date for Replies to Answers to Petitions for Review filed on Wednesday, November 14, 2007 be extended from Wednesday November 21, 2007 to Friday, November 30, 2007 for electronic filing and Monday, December 3, 2007 for filing of paper copies. The grounds for this motion are as follows:
2. Petitions for Review of the Initial Order were filed by Broadwing, Level 3, WITA, ELI/Advanced TelCom, and Pac West on October 24, 2007. These parties, as well as Qwest and Commission Staff, filed Answers to those Petitions on Wednesday, November 14, 2007. While Pac-West continues to analyze all Answers its Petition, Staff's Answer includes several requests to modify the Initial Order to which Pac-West intends to respond as a matter of right under WAC 480-07-825(5)(a). Particularly in light of the upcoming Thanksgiving holiday and the corresponding unavailability of counsel for Pac-West, a short extension of the five day reply period in WAC 480-07-825(5)(c) would enable Pac-West and other interested parties adequate time to review, analyze, and reply as authorized and appropriate to the Answers to the Petitions for Review.

3. On Thursday, November 15, 2007, Pac-West communicated with all parties in this matter suggesting a short extension in the time to file replies to Answers to Petitions for Review. Counsel for Qwest, Staff, Broadwing, Level 3, and ELI/Advanced TelCom have, via email, indicated no objection to Pac-West's request. The remaining parties have not yet responded, but in the interest of prompt consideration of Pac-West's request prior to the existing filing deadline, Pac-West is filing this motion before receiving responses from these parties.
4. Pac-West, therefore, requests that the Commission issue an order granting Pac-West's request and establishing the dates for filing replies to Answers to Petitions for Review as Friday, November 30, 2007 for electronic filing and Monday, December 3, 2007 for filing of paper copies.

DATED this 15th day of November, 2007.

DAVIS WRIGHT TREMAINE LLP
Attorneys for Pac-West Telecomm, Inc.

By



Gregory J. Kopta
WSBA No. 20519

CERTIFICATE OF SERVICE
UT-063038

I certify that I have this day served the attached *PAC-WEST'S MOTION TO EXTEND DATE TO FILE REPLIES TO ANSWERS TO PETITIONS FOR REVIEW* upon all parties of record in this proceeding by sending a copy by electronic mail and U.S. Mail, unless otherwise specified, to the following parties or attorneys of parties:

Lisa Anderl
Qwest Corporation
1600 7th Avenue Rm. 3206
Seattle, WA 98191
Lisa.Anderl@qwest.com

Adam L. Sherr
Qwest Corporation
1600 7th Avenue Rm. 3206
Seattle, WA 98191
adam.sherr@qwest.com
via email only

Mark Reynolds
Mark.Reynolds3@qwest.com

Ethan Sprague
esprague@pacwest.com

Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, WA 98512
rickfinn@localaccess.com

Greg Rogers
Regulatory Counsel
Level 3 Communications, LLC
1025 El Dorado Blvd.
Broomfield, CO 80021
greg.rogers@level3.com

Gregg Strumberger
Regulatory Counsel
Level 3 Communications, LLC
1025 El Dorado Blvd.
Broomfield, CO 80021
gregg.strumberger@level3.com
via email only

Rogelio Pena
Pena & Associates, LLC
4845 Pearl East Circle, Suite 101
Boulder, CO 80301
rpena@boulderattys.com
via email only

Sheila Harris
sheila.harris@integratelecom.com

Jay Nusbaum
jay.nusbaum@integratelecom.com

Dennis Robin
Dennis_robins@eli.net

Larry Strickling
Larry.Strickling@broadwing.com

David W. Wiley
Williams, Kastner & Gibbs PLLC
P.O. Box 21926
Seattle, WA 98111-3926
dwiley@wkg.com
via email only

Tamar E. Finn
Bingham McCutchen, LLP
2020 K Street, NW
Washington, D.C. 20006
Tamar.finn@bingham.com

Gregory M. Romano
MCI Metro Access Services
General Counsel – Northwest Region
1800 41st St.
Everett, WA 98201
Gregory.m.ramano@verizon.com

Jonathon Thompson
Assistant Attorney General
1400 S. Evergreen Park Drive SW
Olympia, WA 98504-0128
jthomps@wutc.wa.gov

Charles Best
Associate General Counsel
Electric Lightwave, LLC
4400 NE 77th Avenue
Vancouver, WA 98662
charles_best@eli.net

Gregory L. Castle
Senior Counsel
AT&T Services, Inc.
525 Market Street, Rm. 2022
San Francisco, CA 94105
gregory.castle@att.com

Dennis Ahlers
Associate General Counsel
Eschelon Telecom, Inc.
730 Second Ave. S., Suite 900
Minneapolis, MN 55402-2489
ddahlers@eschelon.com

Edward W. Kirsch
Bingham McCutchen, LLP
2020 K Street, NW
Washington, D.C. 20006
Edward.kirsch@bingham.com
via email only

Calvin K. Simshaw
CenturyTel
608 Broadway
Vancouver, WA 98660
calvin.simshaw@centurytel.com
via email only

Michael J. Shortley
Michael.shortley@globalcrossing.com

Andrew Metcalfe
ametcalfe@nti.us

Administrative Law Judge Theodora Mace
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250
tmace@wutc.wa.gov

I also certify that on this day the attached original and 7 copies of *PAC-WEST'S MOTION TO EXTEND DATE TO FILE REPLIES TO ANSWERS TO PETITIONS FOR REVIEW* was served via e-mail and messenger delivery to the following:

Ms. Carole J. Washburn
WUTC Records Center
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250
records@wutc.wa.gov

Dated this 15th day of November, 2007.

By: Mary Scarsorie
Mary Scarsorie