

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Petitioners,

v.

ADVANCED TELECOM GROUP, INC.,
et al,

Respondents.

DOCKET NO. UT-033011

MOTION TO DISMISS
ALLEGATIONS RELATING
TO DECEMBER 27, 2001
AGREEMENT BETWEEN AT&T
AND QWEST

MOTION

1 The Washington Utilities and Transportation Commission Staff (Staff) moves to
dismiss allegations against AT&T Communications of the Pacific Northwest, Inc.
(AT&T) and Qwest Corporation (Qwest) relating to the December 27, 2001, agreement
listed on Exhibit A to the complaint.

2 Staff has investigated the allegations relating to this agreement and has
discovered that the terms and conditions contained in the agreement between AT&T
and Qwest dated December 27, 2001, were incorporated into an amendment to an
interconnection agreement that Qwest filed with the Commission on January 31, 2002.

RELIEF REQUESTED

3 Staff respectfully requests that the Commission dismiss the allegations against AT&T and Qwest relating to the December 27, 2001 interconnection agreement listed on Appendix A to the Complaint. All remaining allegations are unaffected by this motion.

Dated: November 5, 2003.

CHRISTINE O. GREGOIRE
Attorney General

SHANNON E. SMITH
Assistant Attorney General
Counsel for Commission Staff