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BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

In the Matter of the Review of:

Unbundled Loop and Switching Rates; the
Deaveraged Zone Rate Structure; and
Unbundled Network Elements, Transport, and
Termination

Docket No. UT-023003

**MCI'S MOTION FOR EXTENSION OF
TIME TO FILE RESPONSES TO
DATA REQUESTS**

WorldCom, Inc. (n/k/a/ "MCI"), on behalf of its regulated subsidiaries in Washington, moves the Commission to extend the deadline for MCI to provide responses to Verizon Northwest Inc.'s ("Verizon") Fourth Set of Data Requests. In support of this motion, MCI states as follows:

1. During the November 17, 2003 prehearing conference, Administrative Law Judge Mace granted Verizon's Motion to Compel and ordered MCI to provide responses to certain data requests included in Verizon's Fourth Set of Data Requests to MCI by December 5, 2003.

2. MCI requests additional time to provide the compelled responses to Verizon's Fourth Set of Data Requests. Due to MCI's participation in Docket No. UT 033044, and the resources recently expended to respond to the Commission's Bench Requests in that docket, MCI personnel will not be able to respond to Verizon's requests by December 5, 2003. MCI believes it will be able to respond by December 12, 2003. This additional time will not

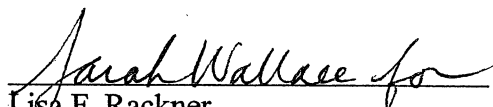
1 prejudice Verizon because responsive testimony regarding the HAI Model is not due until
2 March 26, 2004.

3 3. MCI also states that some information responsive to Verizon's requests include
4 MCI proprietary network information and third-party vendor proprietary data that the
5 Commission has protected as highly confidential in other dockets (e.g., Docket UT 033044,
6 Order No. 02 – Protective Order). In the present docket, the Commission has conditioned the
7 parties' access to comparable Verizon data on the execution of a separate nondisclosure
8 agreement that imposes a higher level of protection than the protective order issued by the
9 Commission. Accordingly, MCI joins AT&T in its request that the Commission amend the
10 protective order in this proceeding to provide appropriate protections for the highly
11 confidential information that MCI is compelled to produce. *See* AT&T Motion to Amend
12 Protective Order and for Extension of Time, Docket No. UT 023003 (December 2, 2003).

13 DATED this 4th day of December, 2003.

14 ATER WYNNE LLP

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17 By:


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CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of December, 2003, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

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I declare under penalty of perjury under the laws of the State of Oregon that the foregoing is true and correct.

DATED this 4th day of December, 2003, at Portland, Oregon.

