



December 5, 2005

Via Hand Delivery

Ernest Johnson
Director, Utilities Division
Arizona Corporation Commission
1200 W. Washington
Phoenix, AZ 85007

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AZ CORP COMMISSION
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Re: In the Matter of the Joint Application of Wiltel Communications, LLC, Wiltel Local Network, LLC and Level 3 Communications, LLC for a Limited Waiver of the Public Utility Holding Companies and Affiliated Interest Rules (Docket Nos. T-0378A-05-0797; T-03779A-05-0797 and T-03654A-05-0797)

Dear Mr. Johnson:

In recent discussions with Utilities Division Staff in the above-referenced docket, it has come to light that Wiltel Communications LLC ("Wiltel") and Level 3 Communications, LLC ("Level 3") are delinquent with regard to Rule 805 Affiliated Interest filings. Both entities regret their failure to make these filings and are working diligently to gather the information necessary to make a full and complete submission.

As a result of the failure to make these filings, both entities are examining their internal systems to confirm that the April 15th deadline for these filings is set forth in all necessary calendaring systems. This calendaring will include appropriate reminders so that the required information will be gathered in sufficient time prior to the deadline. In addition, Wiltel and Level 3 will emphasize with staff responsible for these filings that the filing must be made each year, unless otherwise ordered by the Commission.

In discussions with Staff, it is our understanding that Staff intends to propose an amendment to the Recommended Order that would require both entities to submit the delinquent 805 filings by December 15, 2005. Level 3 and Wiltel will, of course, submit the 805 filings to the Compliance Section by that date. In addition, both entities intend to submit a preliminary 805 filing tomorrow (Wiltel's will be sent by mail) that includes all information available at this time. The filings to be made by December 15, 2005, will include appropriate supplements to tomorrow's filing.

Once again, Level 3 and Wiltel regret their failure to make the required Rule 805 filings and commit to putting processes in place to ensure that this will not occur in the future.

Very truly yours,

A handwritten signature in black ink, appearing to read "Michael Hallam", with a long horizontal flourish extending to the right.

Michael T. Hallam

MTH/jw

cc: Maureen A. Scott