

ORIGINAL

DOCKET NO. T-01



0000057879

BEFORE THE ARIZONA CORPORATION COMMISSION

RECEIVED

19E

1
2 JEFF HATCH-MILLER
Chairman
3 WILLIAM A. MUNDEL
Commissioner
4 MARC SPITZER
Commissioner
5 MIKE GLEASON
Commissioner
6 KRISTIN K. MAYES
Commissioner

Arizona Corporation Commission

2006 AUG 16 P 4:48

DOCKETED

AUG 16 2006

AZ CORP COMMISSION
DOCUMENT CONTROL

DOCKETED BY
ne

7
8 IN THE MATTER OF QWEST CORPORATION'S) DOCKET NO. T-01051B-06-0175
9 APPLICATION FOR ARBITRATION) DOCKET NO. T-02556A-06-0175
10 PROCEDURE AND APPROVAL OF) DOCKET NO. T-03693A-06-0175
11 INTERCONNECTION AGREEMENTS WITH)
12 AZCOM PAGING, INC., HANDY PAGE,)
13 GLEN CANYON COMMUNICATIONS INC.,)
14 AND TELE-PAGE, INC., AND PURSUANT TO)
15 SECTION 252(B) OF THE COMMUNICATIONS) INTERSTATE WIRELESS, INC D/b/a HANDY
16 ACT OF 1932, AS AMENDED BY THE) PAGE'S REQUEST FOR EXTENSION
17 TELECOMMUNICATIONS ACT OF 1996, AND)
18 THE APPLICABLE STATE LAWS.

19
20
21
22
23
24
25
26
27
28
Interstate Wireless, Inc. D/b/a Handy Page ("HP") hereby requests to
the court for an extension and change of dates that the OPENING BRIEFS, and
RESPONSIVE BRIEFS are to be filed.

We did not receive Qwest's First Set of Data Requests to Handy Page
(dated 19 July, 2006) at our office until 26 July, 2006. Qwest requested
that the answers be back to them within 10 business days (31 July, 2006).

We were able to provide the answers and our First Set of Data Request
to Qwest on 10 August, 2006.

The original OPENING BRIEFS date is on 17 August, 2006. When I hand
delivered Qwest's copy of the Data Requests, I asked about requesting an

1 extension to provide Qwest additional time to provide the answers to us. Norm
2 Curtwright from Qwest emailed me on 10 August, 2006, that they would be
3 amendable to an extension. Since then Qwest has submitted another email to
4 us, dated 16 August 2006, that they would OBJECT to an extension. The ACC
5 staff, (Ms. Maureen Scott's email, dated 16 August, 2006) stated that "Staff"
6 would NOT OBJECT to an extension.

7
8 We hereby request the court to extend and push back the dates for the
9 OPENING BRIEFS until 25 August, 2006, and also the RESPONSIVE BRIEFS until
10 one week later, possibly on 1 September, 2006. (Weekend of 1 September 2006
11 is a Holiday weekend).

12
13 This will provide Qwest sufficient time to answer our DATA REQUESTS,
14 and for us not to be penalized by not having the answers from Qwest properly
15 analyzed before the OPENING BRIEFS are due to be filed.

16
17
18
19 Dated this 16th day of August, 2006

20
21
22 By:



23
24 WAYNE MARKIS, President

1 ORIGINAL and 13 copies hand-delivered
2 For filing this 16th day of August, 2006 to:

3
4 Docket Control
5 ARIZONA CORPORATION COMMISSION
6 1200 West Washington Street
7 Phoenix, Az. 85007

8 Copies of the foregoing mailed/delivered
9 this 16th day of August, 2006 to:

10 Norman Curtright
11 Qwest Corporation
12 20 East Thomas Road, 16th Floor
13 Phoenix, AZ 85012

14 Lyn Farmer
15 Chief Administrative Law Judge
16 Hearing Division
17 ARIZONA CORPORATION COMMISSION
18 1200 West Washington Street
19 Phoenix, Az. 85007

20 Christopher Kempley, Chief Counsel
21 Legal Division
22 ARIZONA CORPORATION COMMISSION
23 1200 West Washington Street
24 Phoenix, AZ 85007

25 Ernest G. Johnson, Director
26 Utilities Division
27 ARIZONA CORPORATION COMMISSION
28 1200 West Washington Street
Phoenix, AZ 85007

Melody Markis
Wayne Markis
Interstate Wireless, Inc.
d/b/a Handy Page
841 West Fairmont Drive
Suite 5
Tempe, AZ 85282-3331

Michael L. Higgs, Jr.
Higgs Law Group, LLC.
1028 Brice Road
Rockville, MD 20852-1201

Maureen A. Scott, Esq.
Legal Division
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
Phoenix, Az. 85007

Arizona Reporting Service, Inc.
2627 North Third Street
Suite Three
Phoenix, Az. 85004-1104

By:



WAYNE MARKIS