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BEFORE THE ARIZONA CORPORATION COMMISSION

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2006 OCT 25 P 4: 30

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IN THE MATTER OF QWEST CORPORATION'S APPLICATION FOR ARBITRATION PROCEDURE AND APPROVAL OF INTERCONNECTION AGREEMENT WITH HANDY PAGE, PURSUANT TO SECTION 252(B) OF THE COMMUNICATIONS ACT OF 1934, AS AMENDED BY THE TELECOMMUNICATIONS ACT OF 1996, AND THE APPLICABLE STATE LAWS

DOCKET NOS. T-01051B-06-0175
T-02556A-06-0175
T-03693A-06-0175

QWEST CORPORATION'S MOTION TO RE-OPEN ARBITRATION WITH RESPECT TO ANSWERPHONE, INC.

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Qwest Corporation ("Qwest") respectfully requests that the Commission re-open the arbitration proceeding between Qwest and Answerphone, Inc. ("Answerphone").

Answerphone was one of the Named Carriers Qwest originally named in its application for arbitration and approval of interconnection agreements, on March 17, 2006. On May 9, 2006, Qwest filed its "Third Amendment to Its Application," by which Qwest stated that Answerphone had discontinued its use of paging facilities in Arizona, and accordingly Qwest removed Answerphone from its Application without prejudice. The Commission subsequently removed Answerphone from the proceeding. Since that time, however, Qwest has discovered that Answerphone continues to operate as a wireless provider of paging services, and has continuously been interconnected with Qwest throughout the relevant time periods of this proceeding. Qwest's amendment removing Answerphone was therefore improvident. Qwest

1 sincerely regrets the inconvenience created.

2 For all the reasons stated in the original Application, it is imperative that Answerphone
3 and Qwest's interconnection be set forth in an interconnection agreement. In the last several
4 months, representatives of Qwest have repeatedly attempted to communicate to Answerphone
5 the necessity of an interconnection agreement. As was the case prior to the filing in March,
6 Answerphone still refuses to respond. Therefore, it is necessary to re-open the proceeding.

7 Qwest therefore requests that this proceeding be re-opened with respect to Answerphone.
8 Qwest proposes that the date by which the Commission must decide should be extended to a date
9 to be determined at a procedural conference.

10
11 RESPECTFULLY SUBMITTED, this 25th day of October, 2006.

12 QWEST CORPORATION

13
14 By: 

15 Norman G. Curtright
16 Corporate Counsel
17 20 East Thomas Road, 16th Floor
18 Phoenix, Arizona 85012
19 Telephone: (602) 630-2187

20 ORIGINAL and 13 copies hand-delivered
21 for filing this 25th day of October, 2006, to:

22 Docket Control
23 ARIZONA CORPORATION COMMISSION
24 1200 West Washington Street
25 Phoenix, AZ 85007
26

1 COPY of the foregoing hand delivered
this 25th day of October, 2006, to:

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3 Lyn Farmer, Chief Administrative Law Judge
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4 ARIZONA CORPORATION COMMISSION
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5 Phoenix, AZ 85007

6 Maureen A. Scott, Esq.
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12 Ernest Johnson, Director
Utilities Division
13 Arizona Corporation Commission
1200 West Washington Street
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15 Copy of the foregoing mailed
this 25th day of October, 2006, to:

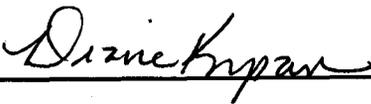
16

17 Answerphone, Inc.
Attention: D. Nady
18 1009 W. 16th Street
Yuma, AZ 85364

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