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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF THE GENERIC INVESTIGATION INTO U S WEST COMMUNICATIONS, INC.'S COMPLIANCE WITH CERTAIN WHOLESALE PRICING REQUIREMENTS FOR UNBUNDLED NETWORK ELEMENTS AND RESALE DISCOUNTS.

DOCKET NO. T-00000A-00-0194  
PHASE II

**QWEST CORPORATION'S RESPONSE TO AT&T'S AND XO'S MOTION TO STRIKE QWEST'S REPLY BRIEF**

Qwest Corporation ("Qwest") submits this response to AT&T's and XO's Motion to Strike and Response to Qwest's Reply Brief. The motion contends incorrectly that Qwest's reply brief, filed February 8, 2002, goes beyond what the Administrative Law Judge ("ALJ") contemplated when he allowed Qwest a reply. Qwest's reply is consistent with the ALJ's ruling, and, accordingly, the AT&T/XO motion should be denied.

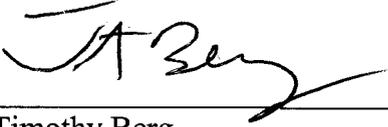
At the supplemental hearing in this docket on January 25, 2002, ALJ Nodes permitted Qwest to submit a reply to the CLEC and Staff briefs filed on February 1, 2002 (1/25/02 Tr. 122-23). In explaining what he was permitting Qwest to file, ALJ Nodes stated: "I'll look for the responses that are going to be filed next Friday, February 1, from CLECs and Staff. To the extent [Qwest] feel[s] the need to respond to any of those, I'll give you that opportunity." *Id.* ALJ Nodes requested further that Qwest limit its reply

"to what you absolutely need to do." *Id.* Qwest complied with the ALJ's instructions; the motion to strike has no basis.

On February 1, the CLECs and Staff submitted five different briefs totaling almost 50 pages. These briefs addressed more than 20 different cost and pricing issues. Qwest's reply to these five briefs was 13 pages long. Mindful of the ALJ's request to address only what was necessary, Qwest limited its reply to (1) three inputs relating to the unbundled loop, (2) the transport pricing issue discussed at the January 25 hearing, (3) the nonrecurring cost issue discussed, and (4) a decision from the United States Court of Appeals for the D.C. Circuit discussed in the CLEC briefs. Qwest did not address the majority of the issues CLECs and Staff raised in their briefs, including, for example, WorldCom's arguments relating to collocation. Consistent with the ALJ's request, Qwest discussed only those issues that it felt compelled to address. The reply is concise and directly responsive to just a limited number of issues that the CLECs and Staff raised in their February 1 briefs.

Accordingly, Qwest's reply complies with the ALJ's ruling, and AT&T's/XO's motion to strike the brief should be denied.

Respectfully submitted this 26th day of February, 2002.

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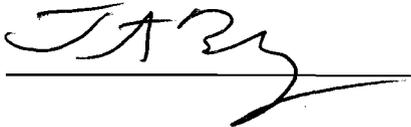
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A handwritten signature in black ink, appearing to read "JAB", is written above a horizontal line that extends to the right.