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BEFORE THE ARIZONA CORPORATION COMMISSION

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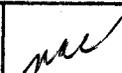
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AZ CORP COMMISSION  
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MAR 12 2003

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COMMISSIONER

IN THE MATTER OF THE GENERIC  
INVESTIGATION INTO U S WEST  
COMMUNICATIONS, INC.'S NKA QWEST  
CORPORATION COMPLIANCE WITH CERTAIN  
WHOLESALE PRICING REQUIREMENTS AND  
RESALE DISCOUNTS

DOCKET NO. T-00000A-00-0194

and

ARIZONA CORPORATION COMMISSION  
Complainant,

DOCKET NO. T-01051B-02-0871

and

vs.

QWEST CORPORATION,  
Respondent

MOUNTAIN TELECOMMUNICATIONS, INC.  
Complainant,

DOCKET NO. T-01051B-03-0092

vs.

QWEST CORPORATION,  
Respondent

MOTION TO POSTPONE PROCEDURAL CONFERENCE

Mountain Telecommunications, Inc. (MTI), by its attorneys, hereby moves the presiding hearing officer in the above-captioned docketed proceedings to postpone the Procedural

Conference presently scheduled to be held on March 13, 2003 until March 25, 2003. In support of this Motion, MTI states as follows:

On March 5, 2003, Assistant Chief Administrative Law Judge, Dwight D. Nodes, issued a Procedural Order in the three above-captioned docketed proceedings. In the Procedural Order, the presiding hearing officer scheduled a Procedural Conference to be held March 13, 2003 at 1:30 p.m., at the offices of the Commission. The stated purpose for the Procedural Conference is to discuss the issues described in the Procedural Order and the various motions pending in these dockets.

Among the pending motions are two motions for injunction filed by MTI. On January 17, 2003, MTI filed a motion for injunction in Docket Nos. T-00000A-00-0194 and T-01051B-02-0871. On February 14, 2003, concurrent with filing a complaint against Qwest Corporation (Qwest), MTI filed a motion for preliminary injunction. As noted in the Procedural Order, both injunction motions request that the Commission enjoin Qwest from charging unlawful rates for unbundled network elements, specifically transport and Local Interconnection Service, pending a final decision by the Commission in Phase III of Docket No. T-00000A-00-0194 regarding transport rates. MTI's January 17 injunction motion was opposed by Qwest and by AT&T, but was supported by Time Warner Telecom of Arizona which concurred with MTI's assertions about the increases in Qwest's transport rates following its implementation of Decision 64922.

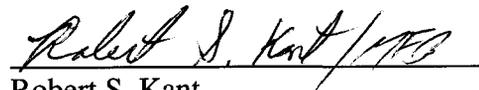
On March 7, 2003 – two days following issuance of the Procedural Order – Commission Staff filed its Response to the Motions of MTI, Qwest and Time Warner. In its Response, Staff has recommended that the Commission reopen the record of Phase II to address the issue raised by MTI and Time Warner. Staff's recommendation is based on its determination that application

of the combined transport and entrance facility rate is producing an unexpected and unreasonable rate increase not contemplated by the Phase II Order (Decision 64922).

Pursuant to Rule 7.1(a) of the Arizona Rules of Civil Procedure, moving parties are afforded five days to reply to responses to motions. If responses are served by mail, an additional five calendar days are added. Thus, movants' replies to Staff's Comments would be due on March 19, 2002. In order to afford movants and the presiding hearing officer a full opportunity to study those replies prior to the Procedural Conference, MTI respectfully moves that the Procedural Conference be postponed until March 25, 2003. Undersigned counsel has contacted counsel for Staff, Qwest, AT&T and Time Warner Telecom of Arizona, each of whom has indicated no objection to this motion.

Respectfully submitted,

**MOUNTAIN TELECOMMUNICATIONS, INC.**



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March 11, 2003

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing Motion to Postpone Procedural Conference on all parties of record in these proceedings by mailing a copy thereof, properly addressed with first class postage prepaid to the following:

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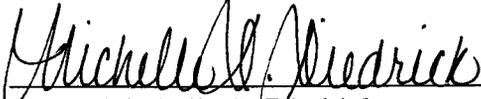
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Dated at Washington, D.C., this 11<sup>th</sup> day of March, 2003.

  
Michelle D. Diedrick

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