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BEFORE THE ARIZONA CORPORATION COMMISSION

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ARIZONA CORPORATION COMMISSION  
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IN THE MATTER OF U S WEST  
COMMUNICATIONS, INC.'S COMPLIANCE  
WITH § 271 OF THE  
TELECOMMUNICATIONS ACT OF 1996.

DOCKET NO. T-00000A-97-0238

**QWEST CORPORATION'S OPPOSITION TO STAFF'S  
MOTION FOR EXTENSION OF TIME TO ISSUE STAFF REPORT AND  
MOTION TO COMPEL STAFF REPORTS ON 272 AND PUBLIC INTEREST**

Qwest Corporation (Qwest) hereby submits its Response to Staff's Motion for Extension of Time to Issue its Report (Staff's Motion) and its Motion to Compel Staff to Issue Reports on Public Interest and 272.

Qwest first wants to clarify that it does **not** agree to the Staff's Motion. When Staff contacted Qwest, Qwest indicated that it would agree to the Motion only if Staff agreed to include dates of April 15, 2002 to issue its report on 272 and April 22 to issue its report on Public Interest (including Track A). Qwest indicated that if Staff was unwilling to include those dates, then Qwest strongly objected to the Staff Motion.

Staff does not include those dates in its Motion. Staff just includes a vague representation that it would use its "best efforts" to issue a 272 report early in the week of April 15, and Staff is silent on the issue of a date to issue its report on Public Interest. Because Staff has not included dates for completion of all of the reports it needs to issue, Qwest objects to its Motion.

It is now imperative for Staff to issue its remaining reports. After next week's workshop, the parties will have concluded all of the work in this docket. The parties have dedicated countless hours over the past three years during more than 40 workshops and hundreds of meetings relating to OSS testing. Now that that work is complete, the only thing remaining is issuance of the Staff reports. The workshops on 272 and Public Interest were held last summer, and the reports should have been issued long ago.

Qwest now understands that the Staff intends to wait until after the Commission conducts its public comment proceedings to issue the report on Public Interest. There is no reason for the Staff to wait to issue the report on Public Interest until after those proceedings. Waiting for completion of those proceedings to issue the report could delay the completion of this docket by 30 days or more. In fact, the public comment proceedings will be more productive if the public has a chance to comment on the Staff's Public Interest Report. Nothing in previous procedural orders justifies waiting for the completion of those proceedings to issue the Public Interest Report. In fact, just the opposite is true. Previous procedural orders provided that the Staff would issue its report expeditiously following the completion of the workshop. The workshop has been complete for many months, and the Staff should be ordered to issue its report.

Finally, Qwest would like to memorialize its understanding of the position of all parties if Staff's Motion is granted. It is Qwest's understanding that no workshop will be held on the Staff's Report, and that there will be a 10-day comment period on the report, at which time an open meeting will be scheduled for the Commission to consider the Staff Report.

In conclusion, Qwest objects to Staff's Motion, because it does not include dates for the Staff to issue all remaining reports and does not set forth the position of all parties regarding additional steps in the event that Staff's Motion is granted. The Staff should be ordered to issue its reports on 272 on April 15 and on Public Interest on April 22. Further, any modification to the schedule for issuance of Staff's Report should specify that no workshop will be held on Staff's Report and that there will be a 10-day comment period on the report, at which time an open meeting will be scheduled for the Commission to consider the Staff Report.

Qwest requests that its Motion to Compel be heard on an expedited basis.

Respectfully submitted this 10<sup>th</sup> day of April, 2002.



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