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BEFORE THE 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 REQUEST FOR AN
EXTENSION OF TIME TO FILE ITS OSS RECOMMENDATION**

Qwest Corporation (Qwest) hereby submits its opposition to Staff's Request for an Extension of Time to File its OSS Recommendation (Staff's Motion).

The parties in this docket, including Staff, agreed several months ago that Staff would issue its OSS recommendations ten (10) days after CGE&Y issued its final OSS test report. The March 29, 2002 Procedural Order in this docket reflects this agreement, providing that CGE&Y would issue its final OSS test report on March 29, 2002 and Staff would issue its report on April 8, 2002. CGE&Y complied with that order by issuing its final report on March 29, 2002.

Staff later requested an extension of the agreed upon deadline to April 10, 2002. The Hearing Division granted this request. Then on April 8, 2002, Staff filed a second request seeking an extension of the time to file Staff's response by April 23, 2002. Qwest objected to this extension, but the Hearing Division again granted Staff's request on April 15, 2002.

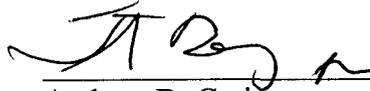
Now, for the third time since the March 29, 2002 Procedural Order was entered, Staff requests an extension of time to issue its report. Staff requests an extension to April 30, 2002, so that its report would be due more than four (4) weeks after CGE&Y issued its report. Staff based its request on the "length and volume" of the CGE&Y and the "complexity" of the issues addressed therein.

The Hearing Division should deny Staff's request for extension. The scope and complexity of the CGE&Y Report has been clear from the beginning and certainly was clear when the parties agreed to the April 8, 2002 deadline. In any event, the length and volume of the report as well as the complexity of the issues were apparent when Staff requested its first and second extensions. The length and complexity of the CGE&Y Report do not provide a basis for a third extension.

Further, CGE&Y's report has been available to Staff since March 29, 2002. Staff has already had more than three weeks to prepare its recommendations and has provided no compelling reason for any further extensions. It is important that deadlines set in Procedural Orders be met or extended only for good cause. Parties to proceedings rely on schedules set forth in Procedural Orders and continued changes to deadlines upset reasonable expectations and schedules based on the deadlines set in the Order.

For these reasons, Qwest opposes Staff's Motion for a third extension of time to file its OSS recommendations and requests that Staff be ordered to file its OSS recommendations no later than Friday, April 26, 2002.

Respectfully submitted this 24th day of April, 2002.



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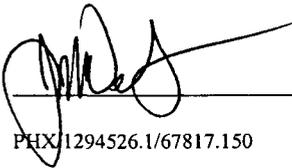
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