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BEFORE THE ARIZONA CORPORATION

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2010 OCT 26 P 3:18

AZ CORP COMMISSION  
DOCKET CONTROL

1  
2 **COMMISSIONERS**  
3 KRISTIN K. MAYES - Chairman  
4 GARY PIERCE  
5 PAUL NEWMAN  
6 SANDRA D. KENNEDY  
7 BOB STUMP

8 IN THE MATTER OF THE JOINT  
9 APPLICATION OF QWEST CORPORATION,  
10 QWEST COMMUNICATIONS COMPANY,  
11 LLC, QWEST LD CORP. dba QWEST LONG  
12 DISTANCE, EMBARQ PAYPHONE  
13 SERVICES, INC. AND CENTURYTEL  
14 SOLUTIONS, LLC FOR APPROVAL OF THE  
15 PROPOSED MERGER OF THEIR PARENT  
16 CORPORATIONS QWEST  
17 COMMUNICATIONS INTERNATIONAL INC.  
18 AND CENTURYTEL, INC.

DOCKET NO. T-01051B-10-0194  
T-02811B-10-0194  
T-04190A-10-0194  
T-20443A-10-0194  
T-03555A-10-0194  
T-03902A-10-0194

**STAFF'S REQUEST FOR AN EXTENSION  
TO FILE SURREBUTTAL TESTIMONY**

19 By Procedural Order dated July 2, 2010, the deadline for Surrebuttal Testimony was set at  
20 November 10, 2010. The hearing is scheduled to commence on November 15, 2010.

21 Staff of the Arizona Corporation Commission ("Staff") respectfully requests an extension of  
22 the deadlines contained in the Commission's July 2, 2010 Procedural Order. Because of the  
23 voluminous discovery received by Staff from Qwest since Staff filed its Initial Testimony in this  
24 matter, Staff is unable to complete its Surrebuttal Testimony by the deadline in this case. The  
25 discovery received by Staff consists of two separate sets. The first set of discovery contains 37 multi-  
26 part questions which when each individual subpart of each question is counted separately comes to  
27 120 separate questions. The second set contains 17 questions but counting individual subparts,  
28 actually comes to 27 questions. So, in addition to having to prepare Surrebuttal Testimony, Staff  
must now answer approximately 150 discovery questions promulgated by Qwest in the same  
timeframe. Many of the questions will take considerable time to answer.

Arizona Corporation Commission

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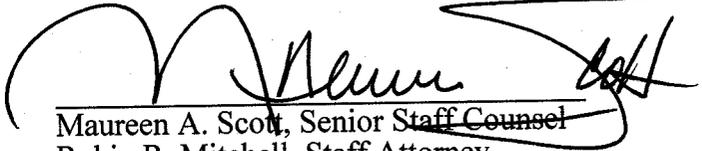
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1 Finally, Staff will also likely need to follow-up with its own discovery on some of the  
2 questions asked by Qwest. As a result, Staff is requesting an extension of time to file Surrebuttal  
3 Testimony until January 4, 2010 and an extension of the hearing date until January 18, 2010. Staff  
4 believes that with this additional time, it can respond to Qwest's discovery in this matter and still  
5 have adequate time to prepare and file its Surrebuttal Testimony. The schedule proposed by Staff  
6 also takes into account the holidays and the anticipated absences by many parties during  
7 Thanksgiving and Christmas.

8 Staff respectfully requests that a Procedural Conference be scheduled at the earliest possible  
9 date to discuss Staff's request.

10 RESPECTFULLY SUBMITTED this 26<sup>th</sup> day of October 2010.

11  
12  
13 

14 Maureen A. Scott, Senior Staff Counsel  
15 Robin R. Mitchell, Staff Attorney  
16 Bridget Humphrey, Staff Attorney  
17 Legal Division  
18 Arizona Corporation Commission  
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22 Original and thirteen (13) copies  
23 of the foregoing filed this  
24 26<sup>th</sup> day of October 2010 with:

25 Docket Control  
26 Arizona Corporation Commission  
27 1200 West Washington Street  
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