



Qwest
421 Southwest Oak Street
Suite 810
Portland, Oregon 97204
Telephone: 503-242-5420
Facsimile: 503-242-8589
e-mail: carla.butler@qwest.com

Carla M. Butler
Sr. Paralegal

January 25, 2006

Frances Nichols Anglin
Oregon Public Utility Commission
550 Capitol St., NE
Suite 215
Salem, OR 97301

Re: ARB 665

Dear Ms. Nichols Anglin:

Enclosed for filing please find an original and (5) copies of Qwest's and Level 3's Joint Motion for Extension of Time to File List Specifying Facts Remaining in Dispute, along with a certificate of service. Please note expedited consideration is requested.

If you have any question, please do not hesitate to give me a call.

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:
Enclosures

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BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

ARB 665

In the Matter of Level 3 Communications,)	QWEST'S AND LEVEL 3'S JOINT
LLC's Petition for Arbitration Pursuant to)	MOTION FOR EXTENSION OF
Section 252(b) of the Communications Act of)	TIME TO FILE LIST SPECIFYING
1934, as amended by the Telecommunications)	FACTS REMAINING IN DISPUTE
Act of 1996, and the Applicable State laws for)	
Rates, Terms, and Conditions of)	EXPEDITED CONSIDERATION
Interconnection with Qwest Corporation)	REQUESTED

Pursuant to OAR 860-013-0031, petitioner Level 3 Communications, LLC ("Level 3") and respondent Qwest Corporation ("Qwest"), through this submission by Qwest, hereby file this joint motion for a one-week extension of time, from January 27, 2006 to February 3, 2006, in which the parties are to file their list specifying the facts remaining in dispute for each outstanding issue, as instructed by Administrative Law Judge Sam Petrillo in his January 20, 2006 Ruling. The hearing in this matter is scheduled to start on February 13, 2006. In addition, because the list is due this Friday, January 27, 2006, the parties respectfully request *expedited consideration* of this motion.

REASONS FOR JOINT MOTION AND EXPEDITED CONSIDERATION

The reason the parties jointly request this extension is that the counsel that have primary responsibility for litigating this arbitration on behalf of both parties are presently engaged this week in a four-day hearing in an arbitration proceeding before the Colorado Public Utilities Commission. As a result, they will be unable to meet to discuss and prepare the required list of facts remaining in dispute in this docket. The parties' counsel, however, would be able to meet to discuss and prepare the required list next week. As such, the parties jointly request a one-week extension, until Friday, February 3, 2006, in which to file the list. A February 3rd filing would provide the Administrative Law Judge with the list of facts remaining in dispute 10 days prior to the start of the hearing on February 13, 2006.

Finally, because the ALJ Ruling of January 20, 2006 required the parties to file the list within one week, on Friday, January 27, 2006, and the parties are jointly requesting a one-week extension, the parties respectfully request expedited consideration of this motion.

CONCLUSION

Accordingly, Level 3 and Qwest, through this submission by Qwest, hereby respectfully request a one-week extension, from January 27, 2006 to February 3, 2006, in which to file their list of facts remaining in dispute, as well as expedited consideration of this motion.

DATED this 25th day of January, 2006.

Respectfully submitted,

QWEST CORPORATION

By: 

Alex M. Duarte (OSB No. 02045)

Qwest

421 SW Oak Street, Suite 810

Portland, OR 97204

503-242-5623

503-242-8589 (facsimile)

Alex.Duarte@qwest.com

Attorney for Qwest Corporation

By: 

Lisa Rackner (OSB No. 87384)

Ater Wynne LLP

222 SW Columbia, Suite 1800

Portland, OR 97201

503-226-8693

503-226-0079 (facsimile)

lfr@aterwynne.com

Attorney for Level 3 Communications, LLC

CERTIFICATE OF SERVICE VIA E-MAIL

I do hereby certify that a true and correct copy of the foregoing QWEST'S AND LEVEL 3'S JOINT MOTION FOR EXTENSION OF TIME TO FILE LIST SPECIFYING FACTS REMAINING IN DISPUTE was served on the 25th day of January, 2006 via e-mail electronic transmission upon the following individuals:

Richard E. Thayer, Esq.
*Erik Cecil
Level 3 Communications, LLC
1025 Eldorado Boulevard
Broomfield CO 80021
Rick.thayer@level3.com
Erik.cecil@level3.com

Christopher W. Savage
Cole, Raywid & Braverman, LLP
1919 Pennsylvania Ave., NW
Washington, DC 20006
Chris.savage@crblaw.com

*Lisa F. Rackner
Ater Wynne, LLP
222 SW Columbia St., Suite 1800
Portland, OR 97201
lfr@aterwynne.com

Henry T. Kelly
Joseph E. Donovan
Scott A. Kassman
Kelley Drye & Warren LLP
333 West Wacker Drive
Chicago, Illinois 60606
(312) 857-2350(voice)
(312) 857-7095 (facsimile)
hkelly@kelleydrye.com
jdonovan@kelleydrye.com
skassman@kelleydrye.com

*Thomas Dethlefs
Qwest Corporation
1801 California St., Suite 900
Denver, CO 80202
Thomas.dethlefs@qwest.com

Jessica A. Gorham
Ater Wynne, LLP
222 SW Columbia St., Suite 1800
Portland, OR 97201
jac@aterwynne.com

DATED this 25th day of January, 2006.

QWEST CORPORATION



By: _____

Alex M. Duarte (OSB No. 02045)
421 SW Oak Street, Suite 810
Portland, OR 97204
503-242-5623
503-242-8589 (facsimile)
alex.duarte@qwest.com

Attorney for Qwest Corporation