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September 15, 2009

Public Utility Commission of Oregon

Attn: Filing Center

550 Capitol St. NE, Ste. 215

PO Box 2148

Salem, OR 97308-2148

To: Hon. Allan Arlow

Public Utility Commission of Oregon

**RE: NORTHWEST PUBLIC COMMUNICATIONS COUNCIL V. QWEST CORP.
Docket DR 26/UC600
Unopposed Motion to Enlarge Time to File Amended Complaint**

Dear Judge Arlow,

Please find enclosed a motion, requesting an enlargement of time to file the Amended Complaint in this proceeding. Mr. Reichman and I have discussed the matter and he has indicated that Qwest has no opposition to the motion for the enlargement of time.

If you would like to have a conference call in regard to that please advise.

Sincerely,

/s/

Frank G. Patrick
Attorney at Law

Cc: Lawrence Reichman (email; US Mail) reicl@perkinscoie.com

Jason W. Jones (email; US Mail) Jason.w.jones@state.or.us

Alex M. Duarte (email; US Mail) alex.duarte@qwest.com

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3 CERTIFICATE OF SERVICE

4 I, the undersigned below, hereby certify that I served the foregoing UNOPPOSED MOTION
5 FOR ENLARGEMENT OF TIME TO FILE AN AMENDED COMPLAINT For The Northwest
6 Public Communications Council on:

7 Lawrence Reichman
8 Perkins Coie
9 1120 N.W. Couch Street, 10th Floor
10 Portland, Oregon 97209-4128
11 reicl@perkinscoie.com

12 Jason W. Jones
13 Department of Justice
14 1162 Court Street NE
15 Salem, Oregon 97301
16 jason.w.jones@state.or.us

17 Alex M. Duarte
18 Qwest Corporation
19 421 SW Oak St., Suite 810
20 Portland, Oregon 97204
21 alex.duarte@qwest.com

22 by the following indicated method or methods:

23 X by **mailing** a full, true, and correct copy thereof in a sealed, first-class
24 postage-prepaid envelope, addressed to the attorney as shown above, the last-known
25 office address of the attorney, and deposited with the United States Postal Service at
26 Seattle, Washington, and by electronic mail on the date set forth below.

_____ by sending full, true and correct copies thereof via **overnight courier** in
sealed, prepaid envelopes, addressed to the attorneys as shown above, the last-known
office addresses of the attorneys, on the date set forth below.

And Certify that I did electronically file same with the PUC Filing Center, with a hard
copy to PUC, Filing Center, 550 Capitol Street NE, Ste 215, PO Box 2148, Salem, OR
97308-2148.

DATED this 15th day of Sptember, 2009

/s/
Frank G. Patrick, OSB 76022

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3 BEFORE THE PUBLIC UTILITY COMMISSION
4 OF OREGON
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7 The Northwest Public Communications
8 Council,

9 Complainant,

10 v.

11 Qwest Corporation,

12 Respondent.

DOCKET NO. DR 26/UC 600

DECLARATION IN SUPPORT OF
UNOPPOSED MOTION FOR ENLARGEMENT
OF TIME TO FILE AN AMENDED
COMPLAINT

13 The undersigned, Frank G. Patrick does submit this Declaration in Support of the Motion
14 to Enlarge Time to file an Amended Complaint.

15 1. I am the new counsel for the Complainants, including the NPCC and the 13 claimants
16 added by the Commission's order of May 4, 2009.

17 2. My review is simply requiring additional time to properly file with the Commission.

18 3. I have discussed this motion with Lawrence Reichman, who has authorized me to
19 represent that Qwest does not oppose the motion.

20 4. I spoke to Jason Jones, of the Department of Justice, it does not oppose the motion.

21 "I hereby declare that the above statement is true to the best of my knowledge and
22 belief, and that I understand it is made for use as evidence in court and is subject to
23 penalty for perjury."

24 DATED this September 15, 2009.

/s/

FRANK G. PATRICK, OSB 76022
Attorney for Complainant