

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 Lead Paralegal

October 30, 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 Corporation's Reply Brief, and its Motion to Have Exhibits 24, 25 and 26 Explicitly Admitted in the Record, along with a certificate of service.

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

Sincerely,

Carla M. Butler

CMB:

Enclosures

L:\Oregon\Executive\Duarte\ARB 665 (Level 3)\ARB 665 Transmittal Ltr 10-30-06.doc

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

ARB 665

In the Matter of LEVEL 3 COMMUNICATIONS, LLC's Petition for Arbitration Pursuant to Section 252(b) of the Communication Act of 1934, as amended by the Telecommunications Act of 1996, and the Applicable State Laws for Rates, Terms, and Conditions with QWEST CORPORATION

QWEST CORPORATION'S MOTION TO HAVE EXHIBITS 24, 25, AND 26 EXPLICITLY ADMITTED IN THE RECORD

Qwest Corporation ("Qwest") hereby moves, for the reasons set for hereafter, that the Commission formally admit Exhibits 24, 25, and 26 into the record in this docket.

ARGUMENT

The Supplemental Opening Testimony of Owest witness William Easton contained three attached exhibits (Exhibits 24, 25 and 26). Each of these exhibits was an agreement between Level 3 and another RBOC. Exhibit 24 is an agreement between Level 3 and Verizon; Exhibit 25 is an agreement between Level 3 and BellSouth; and Exhibit 26 is an agreement between Level 3 and SBC. When Mr. Easton's testimony and exhibits were offered, the exhibit numbers for these three exhibits were not specifically mentioned. However, the transcript

Because these exhibits relate directly to testimony of Level 3 and are copies of public agreements between Level 3 and other carriers, Qwest requests that they be explicitly admitted into the record in this docket.

reflects that these agreements were considered part of the record. (8/29/06 Tr. 171.)

DATED: October 30, 2006

Respectfully submitted,

Alex M. Duarte, OSB No. 02045

Owest

421 SW Oak Street, Room 810

Portland, Oregon 97204

503-242-5623

503-242-8589 (facsimile)

Alex.Duarte@gwest.com

Thomas M. Dethlefs, Colo. Bar No. 31773 Qwest 1801 California, 10th Floor Denver, Colorado 80202 (303) 383-6646 303-298-8197 (facsimile) Thomas.dethlefs@qwest.com Admitted Pro Hac Vice

Ted D. Smith, Utah Bar No. 3017 STOEL RIVES LLP 201 South Main St. Suite 1100 Salt Lake City, UT 84111 801-578-6961 801-578-6999 (facsimile tsmith@stoel.com Admitted Pro Hac Vice

Attorneys for Qwest Corporation

-2-

CERTIFICATE OF SERVICE VIA E-MAIL

I do hereby certify that a true and correct copy of the foregoing QWEST CORPORATION'S MOTION TO HAVE EXHIBITS 24, 25, and 26 EXPLICITLY ADMITTED IN THE RECORD was served on the 30th day of October, 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@gwest.com

Wendy Martin
Ater Wynne, LLP
222 SW Columbia St., Suite 1800
Portland, OR 97201
wlm@aterwynne.com

DATED this 30th day of October, 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