



Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE SHANGHAI WASHINGTON, D.C.

SARAH K. WALLACE
Direct (503) 778-5249
sarahwallace@dwt.com

SUITE 2300
1300 SW FIFTH AVENUE
PORTLAND, OR 97201-5630

TEL (503) 241-2300
FAX (503) 778-5299
www.dwt.com

January 5, 2006

Administrative Law Judge Christina Smith
Oregon Public Utility Commission
Administrative Hearings Division
550 Capitol Street NE
Salem, Oregon 97310-1380

Re: OPUC Docket UM 1232

Dear Judge Smith:

On November 30, 2005, Qwest Corporation filed a Motion to Dismiss in the above-referenced proceeding. Complainants AT&T Communications of the Pacific Northwest, Inc. and TCG Oregon, Time Warner Telecom of Oregon, LLC, and Integra Telecom of Oregon, Inc. ("Joint Complainants") must respond to Qwest's Motion on January 6, 2006. Joint Complainants hereby respectfully request that the Administrative Law Judge modify the current schedule for responding to Qwest's Motion to allow Joint Complainants the opportunity to file a Motion for Leave to Amend the Complaint. I have conferred with Qwest's counsel, Alex Duarte, and he has agreed to the following: (1) Joint Complainants will file their Motion for Leave to Amend on or before January 13, 2006;¹ (2) if the Administrative Law Judge grants the Joint Complainants' motion, Qwest will respond as appropriate, including any new motion to dismiss; and (3) if the Administrative Law Judge denies Joint Complainants' motion, Joint Complainants will respond to Qwest's pending Motion to Dismiss within 15 days from the date of the Administrative Law Judge's denial.

Please contact me if you have any questions. Thank you for your attention to this matter.

Very truly yours,

Sarah K. Wallace

cc: UM 1232 Service List
Greg Kopta

¹ If the Joint Complainants do not file a motion for leave to amend by January 13, 2006, then Qwest and Joint Complainants have agreed that Joint Complainants will file their response to Qwest's pending Motion to Dismiss on January 13, 2006.



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the JOINT COMPLAINANTS' LETTER TO ADMINISTRATIVE LAW JUDGE SMITH REGARDING MOTION FOR LEAVE TO AMEND AND MOTION TO DIMISS was served via electronic mail and U.S. Mail (unless otherwise specified below) on the following parties on January 5, 2006:

Alex M. Duarte Qwest Corporation 421 SW Oak St Ste 810 Portland, OR 97204 alex.duarte@qwest.com	Letty S. D. Friesen AT&T Communications of the Pacific Northwest, Inc 919 Congress Ave, Ste 900 Austin, TX 78701 lsfriesen@att.com
Karen J. Johnson Integra Telecom of Oregon, Inc 1201 NE Lloyd Blvd Suite 500 Portland, OR 97232 karen.johnson@integratelecom.com	Brian Thomas Time Warner Telecom of Oregon LLC 223 Taylor Ave N Seattle, WA 98109-5017 brian.thomas@twtelecom.com
Michael T. Weirich Department of Justice Regulated Utility & Business Section 1162 Court St NE Salem, OR 97301-4096 michael.weirich@state.or.us	

DAVIS WRIGHT TREMAINE


Joyce Brooks