On April 5, 2007, Qwest Corporation ("Qwest") received in the mail the Commission Staff’s Motion to Consolidate Dockets and Response to Cox Arizona Telcom’s Motion to Commence Phase III of the Qwest UNE Pricing Docket ("Staff’s Motion"), seeking to institute a new phase in the wholesale cost docket, which for the most part has been inactive for five years. Staff requests that a Procedural Conference be held On April 16, 2007. Qwest hereby files its initial comments in opposition to the quick scheduling proposed by the Staff. For the reasons stated below, a Procedural Conference on April 16 is not possible. Qwest asks for the opportunity for Qwest, Staff, and other industry participants to consult and coordinate the date for an initial procedural conference and subsequent procedural schedule, and to make a joint scheduling proposal to the Hearing Division, if possible.
Prior to receiving Staff's Motion, Qwest had no indication that the Staff considered the Phase III Cost Docket to be a priority matter, much less that it should be processed as if it were an emergency. Qwest has not had adequate opportunity to consider the scope of issues it believes should be addressed, to assess the resources that will be required, or to determine when the people who must be involved in the case are available.

The Staff did not consult with Qwest regarding its proposed schedule. On the same day that Staff seeks to have a Procedural Conference to initiate Phase III of the Cost Docket, Qwest counsel will be in San Francisco, California, in connection with the oral argument at the Ninth Circuit Court of Appeals in Qwest Corporation v. Arizona Corporation Commission, et al, and Mountain Telecommunications, Inc. (Court of Appeals No. 05-15157), which is coincidentally a case that arose out of the Phase II Cost Docket. Therefore, a Procedural Conference on April 16 is not possible for Qwest.

The scope of a potential Phase III Cost Docket is outlined in vague terms in the Staff Motion. Qwest respectfully submits that the matters that might be addressed in Phase III deserve deliberate thought and care, and that the Staff's proposed schedule is unduly precipitous. As the Commission is aware, Cost Dockets are complicated, intensive, time-consuming regulatory proceedings. Accordingly, the Commission should establish a schedule that provides ample time for Qwest and other industry participants to participate in a meaningful way.

For the reasons stated above, a Procedural Conference on April 16 is not possible. Qwest proposes that Qwest, Staff, and other industry participants first attempt to work together to coordinate the date for an initial procedural conference and procedural schedule, and if agreement can be reached, make a proposal to the Commission.

Qwest respectfully asks that it be allowed to reserve the opportunity to file further comments in Response to the Staff's Motion, concerning the scope of the matters that might be included in any cost docket proceeding.
RESPECTFULLY SUBMITTED, this 10th day of April, 2007.

QWEST CORPORATION

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