## BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

In the Matter of the Application of Qwest	)		
Corporation to Modify the Jurisdictional	)		
Report Requirements in Section 2 by	)	Docket No. TC08-127	
Establishing a Percent Interstate Usage	)		
(PIU) Floor for Unidentified Feature Group	)		
D (FGD) Terminating Traffic.	)		

## QWEST CORPORATION MOTION FOR FURTHER EXTENSION OF SUSPENSION

Qwest Corporation ("Qwest") moves that the previously granted extension in this matter<sup>1</sup> be further extended for up to thirty (30) days following the evidentiary hearing in this docket. Qwest, MCI Communications Services, Inc. d/b/a Verizon Business Services ("Verizon Business"), and AT&T Communications of the Midwest, Inc ("AT&T") have tentatively agreed on a hearing date of July 29<sup>th</sup> and 30<sup>th</sup>, 2009, so Qwest moves the Commission for further extension of the suspension referenced in and granted by Commission Order on March 31, 2009, until Monday, August 31, 2009. Qwest has consulted with all parties and this motion is unopposed. As grounds therefore, Qwest states:

The parties continue to pursue settlement diligently. The parties continue to exchange and analyze data regarding factual matters concerning how Qwest and Verizon Business identify certain forms of traffic, including e.g., international traffic that may be affected by the proposed Qwest tariff revisions. These exchanges are complex, and affect challenges to the proposed tariff not just in South Dakota, but also to similar proposed

<sup>&</sup>lt;sup>1</sup> Order Granting Motion to Extend Suspension, issued March 31, 2009.

tariffs filed in Utah, Colorado, Oregon, Iowa, and Nebraska. Parties to this case have reviewed this motion and take the following positions:

Verizon Business supports the requested extension and agrees that Qwest and Verizon Business are pursuing settlement diligently. Qwest is authorized to file this motion with the concurrence of Verizon Business.

AT&T Communications of the Midwest, Inc. supports the requested extension and concurs in this motion.

LECA supports the requested extension. Qwest is authorized to file this motion with the concurrence of LECA.

SDTA supports the requested extension. Qwest is authorized to file this motion with the concurrence of SDTA.

WHEREFORE, Qwest respectfully requests a further extension of the previously granted suspension until August 31, 2009, or until the Commission issues a dispositive order in this docket, whichever comes first.

Respectfully Submitted,

George Baker Thomson, Jr.

Corporate Counsel

**Qwest Corporation** 

1801 California St., 10<sup>th</sup> Floor

Denver, CO 80202

## **CERTIFICATE OF SERVICE**

I hereby certifies that on the 28<sup>th</sup> day of May, 2009, the foregoing **QWEST CORPORATION MOTION FOR FURTHER EXTENSION OF SUSPENSION** was served electronically in the above-captioned action to the following at their last known e-mail addresses.to-wit:

PATRICIA VAN GERPEN, EXECUTIVE DIRECTOR SD PUBLIC UTILITIES COMMISSION patty.vangerpen@state.sd.us

KAREN E CREMER, STAFF ATTORNEY SD PUBLIC UTILITIES COMMISSION karen.cremer@state.sd.us

TERRI LABRIE BAKER, STAFF ANALYST SD PUBLIC UTILITIES COMMISSION terri.labriebaker@state.sd.us

JON THURBER, STAFF ANALYST SD PUBLIC UTILITIES COMMISSION jon.thurber@state.sd.us

WILLIAM VAN CAMP ATTORNEY AT LAW bvancamp@olingerlaw.net

BRETT M. KOENECKE ATTORNEY AT LAW koenecke@magt.com

THOMAS F.DIXON VERIZON BUSINESS thomas.f.dixon@verizon.com

DARLA POLLMAN ROGERS ATTORNEY AT LAW dprogers@riterlaw.com

RICHARD D COIT
EXECUTIVE DIRECTOR AND
GENERAL COUNSEL
SDTA
richcoit@sdtaonline.com