

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

In the Matter of

CENTURYLINK, INC.,

Application for Approval of Merger between
CenturyTel, Inc. and Qwest Communications
International, Inc.

Docket No. UM 1484

**JOINT MOTION FOR EXTENSION OF
BRIEFING SCHEDULE**

JOINT MOTION FOR EXTENSION OF BRIEFING SCHEDULE

Charter Fiberlink OR-CCVII, LLC, Level 3 Communications, LLC, Covad Communications Company, tw telecom of oregon, llc, XO Communications Services, Inc., Priority One Telecom, Inc., Sprint Communications Company, L.P., Sprint Spectrum, L.P., Nextel West Corp., T-Mobile West Corporation, and TRACER (collectively, "Joint Movants") hereby submit this Motion for Extension of the Briefing Schedule in the above-captioned matter.¹ As grounds therefore, the Joint Movants state as follows:

1. At the close of the evidentiary hearing Judge Arlow adopted a post-hearing briefing schedule that the parties had proposed for adoption. That schedule provided that post-hearing briefs will be submitted on January 10, 2011, and reply briefs will be submitted on January 18, 2011. Significantly, this briefing schedule was proposed by the parties, and adopted by Judge Arlow, based on the *assumption* that transcripts of the evidentiary hearing would be distributed by the court reporter no later than December 29, 2010.²

¹ Counsel for the Joint Movants has communicated with counsel for the Joint Applicants regarding the requested extension and the Joint Applicants have indicated that they will not agree to the requested extension.

² See Hearing Transcript, Vol. 1, p. 207, lines 4-22.

2. However, transcripts of the evidentiary hearing were *not* distributed by the court reporter, or received by the parties, on December 29, 2010. In fact, the court reporter distributed several different portions of the agreement in a piece-meal approach several days after December 29. Specifically, the court reporter distributed: Volume 1 (of 3) of the transcript for the first day of the hearing (December 16, 2010) after 5 P.M. on December 30, 2010; Volume 3 (of 3) of the transcript for the first day of the hearing (December 16, 2010) after 10:30 A.M. PST on January 1, 2011; and Volume 1 (of 1) of the transcript for the second day of the hearing (December 17, 2010) after 5:30 P.M. on January 3, 2011. Even more troubling, as of the date of this filing, the parties have *not yet received* Volume 2 (of 3) of the transcript for the first day of the hearing (December 16, 2010), which contains highly confidential information.

3. Thus, the Joint Movants still do not have a complete set of the transcript. Moreover, portions of the transcript were not received until several days after the anticipated delivery date of December 29, 2010. Thus, in light of the fact that Joint Movants do not have access to the entire transcript of the evidentiary hearing as originally contemplated when the briefing schedule was established, unless the briefing deadlines are extended, the Joint Movants will be severely prejudiced in their ability to prepare briefs that will make full use of the evidentiary record in this proceeding.

4. Accordingly, the Joint Movants request that the due dates for the submission of post-hearing and reply briefs be extended by one week as follows:

- Post-Hearing Briefs due **January 17, 2011**.
- Reply Briefs due **January 24, 2011**.

5. WHEREFORE, the Joint Movants respectfully request that the deadline for submission of post-hearing briefs be extended to January 17, 2011 and the deadline for submission of reply briefs be extended to January 24, 2011.

DATED this 5th day of January 2011.

Respectfully submitted,

DAVIS WRIGHT TREMAINE LLP



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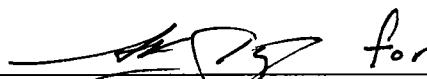
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CERTIFICATE OF SERVICE
UM 1484

I hereby certify that the **Joint Motion for Extension of Briefing Schedule** was served on the following persons on January 5, 2011, by email to all parties and by U.S. Mail to parties who have not waived paper service:

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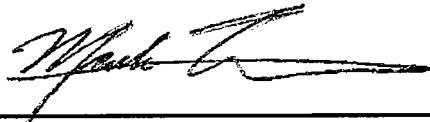
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