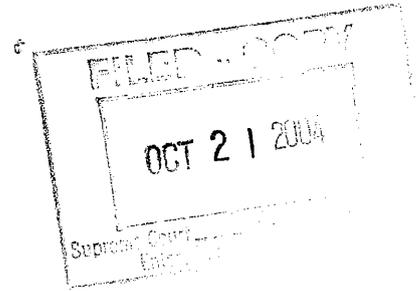


DONALD L. HOWELL, II
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, ID 83720-0074
(208) 334-0312
IDAHO BAR NO. 3366



Attorney for the Respondent on Appeal/Respondent on Cross Appeal,
Idaho Public Utilities Commission

IN THE SUPREME COURT OF THE STATE OF IDAHO

**ROBERT RYDER DBA RADIO PAGING
SERVICE, JOSEPH B. McNEAL DBA
PAGEDATA AND INTERPAGE OF IDAHO,
AND TEL-CAR, INC.**

**Petitioners/Appellants – Respondents on
Cross Appeal,**

v.

IDAHO PUBLIC UTILITIES COMMISSION,

**Respondent on Appeal/Respondent on
Cross Appeal,**

and

QWEST CORPORATION,

**Respondent/Respondent on Appeal –
Appellant on Cross Appeal .**

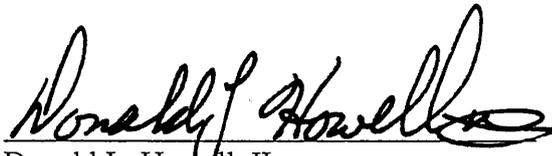
**SUPREME COURT
DOCKET NO. 29175**

**IDAHO PUBLIC UTILITIES
COMMISSION'S MOTION
FOR EXTENSION OF TIME
TO FILE BRIEFS**

COMES NOW the Respondent on Appeal/Respondent on Cross Appeal, Idaho Public Utilities Commission, and respectfully moves this Court pursuant to Appellate Rules 34(e) and 46, for an extension of time in which to file the Commission's Briefs in this case. This Motion is based upon the attached Affidavit of Donald L. Howell, II, Deputy Attorney General, and counsel of record in this appeal. The Commission asserts that there is good cause to grant the requested extension of time.

IDAHO PUBLIC UTILITIES COMMISSION'S
MOTION FOR EXTENSION OF
TIME TO FILE BRIEFS

Respectfully submitted this 21st day of October 2004.



Donald L. Howell, II
Deputy Attorney General

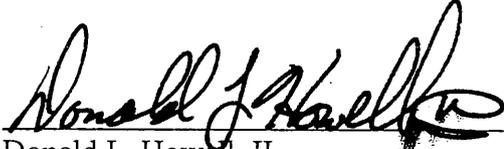
Attorney for Respondent on Appeal/Respondent on
Cross Appeal, the Idaho Public Utilities Commission

State of Idaho)
) ss
County of Ada)

AFFIDAVIT FOR DONALD L. HOWELL, II

Donald L. Howell, II, being duly sworn and deposed and says:

1. I am counsel of record for the Idaho Public Utilities Commission in this matter.
2. The due date for the Commission's Respondent on Appeal Brief is November 5, 2004. The due date for the Commission's Respondent Brief on Cross Appeal is December 3, 2004.
3. The Appellants (hereinafter referred to as the "Pagers") have been previously granted two extensions, one before and one after the temporary remand. On March 8, 2004, the Court temporarily remanded this matter to the Idaho Public Utilities Commission. Following the remand, the Pagers initial Brief was due September 13, 2004. The Pagers requested and were granted one extension to October 8, 2004.
4. This is the Commission's first request for an extension.
5. An extension of the filing date for the Commission's Respondent Brief and Respondent on Cross Appeal Brief became necessary once the due date for the Pagers Brief was extended from September 13 to October 8. I am scheduled to be out of the country for nearly two weeks starting October 29, 2004. In addition, I have previously scheduled travel and public hearings before the Commission.
6. Extending the due date for the Commission's Respondent Brief by 17 days would allow sufficient time for me to return to Boise and to complete the Commission's Respondent Brief. The Commission requests an extension of the due date for its Respondent Brief on Cross Appeal by 3 days.
7. If granted, the Commission's Respondent Brief on Appeal would be due November 22, 2004, and the Commission's Respondent Brief on Cross Appeal would be due December 6, 2004.
8. Both the Pagers and Qwest have verbally agreed to stipulate to the Commission's application for the extensions.
9. If the Commission is granted the extensions requested above, this will allow sufficient time for the Commission to file its Respondent Briefs.



Donald L. Howell, II
Deputy Attorney General

SUBSCRIBED AND SWORN to me this 21st day of October 2004.



Susan Livingston
Notary Public for Idaho, Residing at Boise, Idaho
My Commission expires 6-7-09 ^{emmett}

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 21ST DAY OF OCTOBER 2004, SERVED THE FOREGOING **IDAHO PUBLIC UTILITIES COMMISSION'S MOTION FOR EXTENSION OF TIME TO FILE BRIEFS**, IN CASE NO. USW-T-99-24, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

BILL BATT
BATT & FISHER LLP
5TH FLOOR
101 S CAPITOL BLVD
BOISE ID 83702-5958

JIM JONES
JIM JONES & ASSOCIATES
1275 SHORELINE LANE
BOISE ID 83702-6870



SECRETARY

CERTIFICATE OF SERVICE