



STATE OF WASHINGTON

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

1300 S. Evergreen Park Dr. S.W., P.O. Box 47250 • Olympia, Washington 98504-7250

(360) 664-1160 • TTY (360) 586-8203

November 4, 2008

Thomas F. Dixon, Assistant General Counsel
Northwest Region
Verizon Northwest, Inc.
707 17th Street, #4200
Denver, Colorado 80202

RE: Petitions for Waiver of WAC 480-120-071 Extension of service

Dear Mr. Dixon:

On October 4, 2008, the Washington Utilities and Transportation Commission adopted a new rule governing line extensions by telecommunications companies. The new rule applies back in time to requests for extension of telephone service made prior to the adoption of the new rule if the company had not completed or accepted the request. Thus, the new rule applies to requests for line extensions for which companies had exemption petitions pending on October 4, 2008. Verizon Northwest, Inc. has five such petitions pending—UT-061925, UT-061926, UT-071737, UT-080243, and UT-080363.

Under the old WAC 480-120-071, the company was required to provide the extension requested, regardless of the distance, at a charge of no more than twenty times the basic monthly service rate. However, companies could petition the commission (1) for a determination that the customer was not reasonably entitled to service, or (2) for a determination that it was unreasonable for the cost of the extension to be borne by the access charge cost recovery method, and therefore requiring the customer to pay the direct cost. This provision was the basis for your petition in this docket.

Under the new WAC 480-120-071, by contrast, the company may charge the customer the company's actual cost of extending service beyond an allowance of one thousand feet. Although the company is not ordinarily entitled to charge the person requesting the line extension for the cost of the first one thousand feet, the company may petition the commission for a finding that the cost of the first thousand feet is extraordinary and therefore should be borne partly by the customer (in addition to any cost of extending beyond one thousand feet).

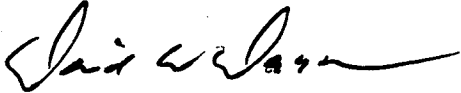


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Given that the legal rights and obligations of the parties to these pending exemption petitions have changed, you may choose to withdraw your petitions, advise the parties who requested the line extensions of the new terms and conditions applicable to their requests, and if the requesting party still wishes to apply for a line extension, process that application according to the new rule. If for any reason you do not wish to withdraw your petition, we ask that you advise us of that so that we may schedule a prehearing conference. If we have not received notification that you wish to proceed with your petition by December 1, 2008, we will dismiss your petition without prejudice.

For further information, or if you have any questions, please contact Sharyn Bate by e-mail sbate@utc.wa.gov or telephone (360) 664-1295.

Sincerely,

A handwritten signature in black ink, appearing to read "David W. Danner", with a long, sweeping horizontal stroke extending to the right.

David W. Danner
Executive Director and Secretary