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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale ..... )	<b>PHASE II</b>
In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for U S WEST COMMUNICATIONS, INC. )	DOCKET NOS. UT-960369, UT-960370, UT-960371
..... )	U S WEST'S RESPONSE TO PETITIONS FOR RECONSIDERATION AND/OR CLARIFICATION OF 17th SUPPLEMENTAL ORDER
In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for GTE NORTHWEST INCORPORATED )	
..... )	

Pursuant to the Commission's notice of September 13, 1999, U S WEST Communications, Inc., (U S WEST) hereby files the following response to the petitions for reconsideration and/or clarification of the Seventeenth Supplemental Order filed by GTE and Commission Staff.

U S WEST concurs with GTE's petition in Section I, which raises the issue of when Phase II prices should go into effect. GTE correctly points out that the Commission has clearly and repeatedly stated that Phase II prices will replace the interim arbitrated rates. There is no basis in policy or law to continue those below-cost rates any longer, and the Phase II rates should be

U S WEST's Response to  
Petitions for Reconsideration

**U S WEST, Inc.**  
1600 7th Ave., Suite 3206  
Seattle, WA 98191  
Telephone: (206) 343-4000  
Facsimile: (206) 343-4040

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allowed to go into effect. U S WEST also agrees with GTE's request in Section V that the Commission clarify the various deadlines for filing the various cost studies and tariffs required by the 17th Supplemental Order.

U S WEST also concurs with Staff's petition to the extent that it seeks clarification of the scope of the deaveraging which will take place in Phase III. However, U S WEST reiterates its position that implementation of Phase II prices should not await Phase III deaveraging, especially when it is not certain whether or when that deaveraging will be required. U S WEST further notes that if deaveraging is required, it would appear that the requirement is for deaveraging of all the UNEs, as well as interconnection, and is not limited to the loop. 47 CFR 51.507; First Report and Order ¶ 764 (CC Docket No. 96-98, First Report and Order, FCC 96-325 [rel. Aug. 8, 1996]).

Finally, with regard to the deaveraging issue, U S WEST believes that the Commission should clarify that it will undertake wholesale deaveraging consistent with its rulings in this docket and Docket No. UT-980311(a), and address deaveraging only in the context of universal service reform, deaveraged retail prices, and the extent of competitive activity in the state (Docket No. UT-980311(a) 10th Supplemental Order, ¶ 21).

Respectfully submitted this 21st day of September, 1999.

U S WEST Communications, Inc.

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Lisa A. Anderl, WSBA No. 13236