

BEFORE THE WASHINGTON STATE  
UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Review of  
Unbundled Loop and Switching Rates  
and Review of the Deaveraged Zone  
Structure

NO. UT-023003

COMMISSION STAFF'S  
RESPONSE TO VERIZON'S  
MOTION TO AMEND THE  
PROCEDURAL SCHEDULE

1           The Washington Utilities and Transportation Commission (Commission) Staff (Staff) files the following in response to Verizon Northwest, Inc.'s (Verizon) Motion to Amend the Procedural Schedule. As set forth more fully below, the Staff does not object to a brief extension of the filing deadlines in this docket or a brief continuance of the hearing date.

2           As a preliminary matter, the Commission did not deny Verizon's motion to strike solely because AT&T Communications of the Pacific Northwest, Inc. (AT&T) and WorldCom, Inc. d/b/a/ MCI (MCI) had represented that they would provide information from TNS as requested by Verizon. Rather the Commission denied Verizon's motion to strike because granting that motion "would be a drastic measure and uncalled-for at this point." *In the Matter of the Review of Unbundled Loop and Switching Rates; the Deaveraged Zone Rate Structure; and Unbundled Network Elements, Transport, and Termination (Recurring Costs)*, Docket No. UT-023003, Eighteenth Supp.

Order, ¶ 21 (Dec. 5, 2003).

3           It appears from the correspondence appended to Verizon's motion that AT&T and Verizon are working together to accomplish the production of the TNS information, which is third-party proprietary information. It further appears that AT&T has committed to providing the information upon Verizon's execution of third-party confidentiality agreements.

4           With respect to Verizon's request to amend the procedural schedule, Commission Staff does not object to a brief extension of time to file testimony. Staff believes additional time to file testimony could be accomplished while retaining the scheduled hearing dates. However, Staff would not contest a brief continuance of the hearing dates, if necessary. Staff is not available for hearing the week of June 7-14, due to witness unavailability. Staff is not available for hearing June 24-26 because Staff's counsel will be busy with another Commission docket.

Dated: March 8, 2004.

Respectfully submitted,

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