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BEFORE THE WASHINGTON UTILITIES AND  
TRANSPORTATION COMMISSION

In the Matter of the Petition of	)	Docket No. UT-011439
VERIZON NORTHWEST, INC.,	)	VERIZON NORTHWEST INC.'S SUPPORT
For Waiver of WAC 480-120-071(2)(a)	)	OF QWEST CORPORATION'S MOTION
_____	)	TO JOIN RCC MINNESOTA, INC. AS
	)	PARTY

Verizon Northwest Inc. ("Verizon") supports Qwest Corporation's Motion to Join RCC Minnesota, Inc. ("RCC") as a Party. Because RCC has been designated as an eligible telecommunications carrier ("ETC") in the Verizon exchange at issue in this case (Bridgeport), RCC's joinder is required. RCC has represented that it does, or will, serve this exchange. (RCC Petition, Par. 12). Whether RCC actually provides service to the two locations at issue, or whether RCC must provide such service because RCC is an ETC<sup>1</sup>, are questions which the Commission must address in this proceeding.

The Commissioner cannot make a proper determination on Verizon's waiver request under WAC 480-120-071(7)(a) or (b) without consideration of the efficiencies, costs and characteristics of all of the carriers obligated to serve the two locations at issue. Therefore, RCC must be joined as a party.

<sup>1</sup> The FCC has said: "A new entrant, once designated as an ETC, is required, as the incumbent is required, to extend its network to serve new customers upon reasonable request." See In the matter of Federal State Joint Board on Universal Service, Western Wireless Corporation Petition for Preemption of an Order of the South Dakota Public Utilities Commission, CC Docket No. 96-45, FCC 00-248 (released August 10, 2000).

VERIZON NORTHWEST INC.'S SUPPORT OF  
QWEST'S MOTION TO JOIN RCC  
MINNESOTA, INC. AS PARTY -- 1

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1 RESPECTFULLY SUBMITTED this \_\_\_\_\_ day of June, 2002.

2 GRAHAM & DUNN PC

3  
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