

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the	)	
	)	DOCKET NO. UT-003013
Continued Costing and Pricing of	)	<i>PART A</i>
Unbundled Network Elements, Transport,	)	
Termination, and Resale.	)	COMMISSION STAFF'S
	)	COMMENTS ON QWEST AND
	)	VERIZON MICROWAVE
	)	COLLOCATION COMPLIANCE FILINGS
_____	)	

On April 30, 2001, Qwest Corporation and Verizon Northwest Inc., filed Microwave Collocation tariff advices 3222T and 985T respectively, stating that the advices are filed in compliance with the Thirteenth Supplemental Order in Docket UT-003013 (Part A). The Commission requested that Staff review the compliance filings and file comments by May 16, 2001.

In paragraph 377, the Commission directed Qwest and Verizon to file standardized microwave collocation tariffs. In paragraph 379, the Commission further directed the parties “to model their tariff offerings consistent with collocation costs developed in Part A and Teligent’s proposed design of a microwave collocation tariff offering, and to explain any departure from those guiding sources.” Staff has reviewed the companies’ compliance tariff filings and believes that the filings substantially comply with most of the Commission’s Order regarding microwave collocation.

However, Staff notes that in some instances both Qwest and Verizon have incorporated Individual Case Basis (ICB) prices in their filed tariffs. Although Teligent raised concerns in its

briefs regarding ICB pricing, Qwest and Verizon both state in the letters accompanying their tariff filings that Teligent and Winstar agree with the tariffed rates, including the prices on ICB, in the compliance filings. Given these considerations, Staff does not object to the limited use of ICB pricing. Therefore, Staff recommends that the Commission allow the compliance filings to go into effect.

DATED this 16<sup>th</sup> day of May, 2001.

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