## BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Development of Universal Terms and Conditions for	)	Docket No. UT-011219	
Interconnection and Network Elements	)		
to be Provided by Verizon Northwest Inc.	)		

## JOINT MOTION TO AMEND SCHEDULE TO ALLOW COMMISSION ASSESSMENT OF THE TRIENNIAL REVIEW ORDER

All active parties to this proceeding, by counsel, hereby jointly move the Commission to amend the schedule to allow the Commission to assess the FCC's Triennial Review Order (TRO). This joint motion is based upon the following:

- 1. When the current schedule to this proceeding was established, all parties reasonably expected that the TRO would be issued by May 2003. The parties agree that the negotiations regarding many parts of Verizon's interconnection agreement are affected by or dependent on the TRO and subsequent proceedings to interpret and enforce it.
- 2. The parties have diligently been negotiating the portions of Verizon's interconnection agreement not affected by or related to the TRO. The parties will continue to do so regardless of the delay requested herein for other aspects of the proceeding.
- 3. The Commission has opened a new docket for receiving and evaluating comments regarding the TRO, including how it affects this docket. The precise nature of how the Commission will proceed is not yet known. Efficiency and avoiding duplication of efforts will be served by allowing proceedings relating to the TRO to precede final negotiations of the affected portions of Verizon's interconnection agreement. Furthermore, some of the parties hereto lack the resources to participate simultaneously in TRO proceedings and proceedings on Verizon's interconnection agreement.

4. Therefore, the parties propose that the Commission suspend the existing schedule in this matter, allow the parties to continue to negotiate the portions of Verizon's interconnection agreement not affected by the TRO, and schedule a prehearing conference as soon as possible after the Commission's prehearing conference and evidentiary hearing relating to the TRO, which are currently scheduled to begin on September 26 and November 10, respectively. At the prehearing conference requested herein, the parties can (1) report on the status of negotiations of non-TRO-affected items, (2) consider the nature, status and timing of TRO proceedings before this Commission, and (3) suggest a new schedule for testimony and hearings.

DATED this 24<sup>th</sup> day of September 2003.

## Respectfully submitted,

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC. ESCHELON TELECOM, INC.

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## **CERTIFICATE OF SERVICE**

I hereby certify an original and eleven copies of the foregoing Joint Motion to Suspend Schedule were sent by overnight mail and one copy sent by electronic mail to Ms. Carole J. Washburn, Executive Secretary, Washington Utilities & Transportation Commission, 1300 S. Evergreen Park Drive SW, Post Office Box 47250, Olympia, WA 98504-7250 and to the following by regular and electronic mail:

DATED this 24<sup>th</sup> day of September, 2003.

Meredith B. Miles

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