

November 16, 2005

Bob Wallis, ALJ
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: *Verizon/MCI Merger*
Docket No. UT-050814

Dear Judge Wallis:

Staff hereby moves for admission of Ms. Roth's response to Public Counsel's Records Requisition No. 8, which is enclosed herein. I have inquired of all parties and they have stipulated to its admission.

Record Requisition No. 8 required Ms. Roth to produce a table that would show her calculations regarding the percentage of Verizon customers (as represented by lines in service) that would be affected by the rate center consolidations proposed in term two of the Settlement Agreement. Tr. at 591.

Public Counsel produced a cross examination exhibit for Ms. Roth (Ex. 105-HC, page 3) purporting to show this same thing. That exhibit was admitted over Staff's objection on the theory that the record would make clear the strengths and limitations of the document. Tr. at 597. Admitting Staff's response to Record Requisition No. 8 will complete the record on this issue.

Sincerely,

JONATHAN C. THOMPSON
Assistant Attorney General

JCT:tmw
Enclosures
cc: Parties