

Before the

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UT-050814

VERIZON COMMUNICATIONS INC.

AND

MCI, INC.

RESPONSES TO XO RECORD REQUISITIONS NOS. 4- 7

**HIGHLY CONFIDENTIAL PER PROTECTIVE ORDER
IN WUTC DOCKET NO. UT-050814**

REDACTED

November 15, 2005

Docket No. UT-050814
Verizon Responses to XO Record Requisition Nos. 4 - 7
November 15, 2005

CONFIDENTIAL INFORMATION

Any confidential or proprietary information or documents Verizon and MCI produce are subject to the terms of the Protective Agreement and any clarifications or amendments thereto.

RECORD REQUISITION NO. 4:

Regarding the fGTE and MCI interconnection agreement in Washington, when was it executed and was it arbitrated or adopted.

Response:

All of the effective Verizon and MCI interconnection agreements in the state of Washington were adopted. None were arbitrated. The execution dates are found in the following table:

MCI Entity Name	Verizon Execution Date
MCImetro Access Transmission Services Inc.	1/5/2004
MCI WORLDCOM Communications, Inc.	1/5/2004
MCI WORLDCOM Communications, Inc. (as successor to Rhythms Links Inc.)	11/30/2001

Prepared By: Beth Abesamis
Date: November 14, 2005
Witness: Michael Beach

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RECORD REQUISITION NO. 5:

Please provide a copy of the October 31, 2005 letter that Verizon sent to the FCC.

Response:

The letter is attached. (See WA_RecordRequisition5_Attach1_VZ-MCI Agreement Letter to FCC)

Prepared By: James Miggans
Date: November 14, 2005
Witness: Carl Danner

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RECORD REQUISITION NO. 6:

Please provide a download of the GeoLit report (source of 247 buildings) as referenced on Page 106, Lines 5-6 of the rebuttal testimony of William Taylor.

Response:



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Prepared By: Joel David
Date: November 14, 2005
Witness: William Taylor

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RECORD REQUISITION NO. 7:

Please state the number of commercial buildings in Verizon Northwest's service territory in Washington.

Response:

The Company is not able to determine the number of commercial buildings in its service territory. The Company keeps track of revenue producing units such as access lines, UNEs, loops, circuits and minutes-of-use but it does not track the number of commercial buildings. This type of information could only be developed via a burdensome and time-consuming special study which would rely on information that is not in the Company's possession.

Prepared By: James Miggans
Date: November 14, 2005
Witness: William Taylor