

January 6, 2004

Ms. Carole J. Washburn,  
Executive Secretary  
Washington Utilities and  
Transportation Commission  
Chandler Plaza Building  
1300 S. Evergreen Park Drive SW  
Olympia, Washington 98504

Subject: **UT-032063 – VERIZON COMMENTS**

Dear Ms. Washburn:

Verizon Northwest Inc. (Verizon) submits these comments and statement in response to the Commission's December 29, 2003 Notice of Receipt of Petition for Declaratory Order and Opportunity to Submit Comments and Statements of Interest and Consent.

Verizon supports the position of Qwest in this matter. Verizon has not read WAC 480-120-262(3) as applying to wholesale services and, for the reasons set forth by Qwest, the rule should not be applied to wholesale services.

Verizon is not certain whether it would be considered a "necessary party" under RCW 34.05.240(7) in this matter, but in any event it does not object to the use of a declaratory order to address the issues raised by Qwest's petition.

Please call me on 425-261-5238 if you have any questions.

Very truly yours,

Joan Gage  
State Manager – Regulatory Affairs  
C: mydocuments/032063ltr.doc