

**BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

In the Matter of)	
)	DOCKET NO. UT- 041127
THE JOINT PETITION FOR)	
ENFORCEMENT OF)	AFFIDAVIT OF SHERRY
INTERCONNECTION)	LICHTENBERG
AGREEMENTS WITH VERIZON)	
NORTHWEST, INC.)	
(a/k/a GTE))	

1. I, Sherry Lichtenberg, Senior Manager of Operations for MCI, Inc., hereby affirm and swear as follows.

2. As Senior Manager of Operations, my job responsibilities include the management of MCI local services for the consumer and small business segment of the market, including MCI's UNE-P entry across the country and developing the process as necessary to service and support customers on both the unbundled network element platform ("UNE-P") and UNE loop products.

3. MCI received Verizon's letters of June 8, 2004 and July 20, 2004 advising it of Verizon's intention to discontinue the provision of unbundled switching out of its Mt. Vernon, Washington switch.

4. MCI and Verizon have entered into an interconnection agreement for the state of Washington. The Commission approved the interconnection agreement on December 31, 2004 in Docket No. UT 033063.

5. Our interconnection agreement with Verizon requires Verizon to provide unbundled network elements, including unbundled switching. See Attachment 1 to this Affidavit.

6. MCI provides local voice services to end user customers in the state of Washington. We rely on our interconnection agreement with Verizon to provide those services in Verizon's local territory. MCI relies on the ability to purchase unbundled switching in order to provide all of its local services to residential and small business customers in Verizon territory in the state of Washington. MCI

provides its local product known as "The Neighborhood," in Verizon's territory using Verizon's UNE-P, which includes the unbundled switching element.

7. MCI began marketing its local services in the Verizon territory in Washington in the first quarter of 2004. MCI provides local exchange services to more than 100 customers served by Verizon's Mount Vernon, Washington switch through the purchase of Verizon's UNE-P product.

8. Verizon ceased accepting orders for UNE-P relating to its Mount Vernon switch on or about August 28, 2004. As a result of this action, MCI is unable to continue to offer its Neighborhood product to consumers served by the Mount Vernon switch. MCI does not have a way to place the order since our ordering is done via electronic data interchange, EDI. MCI uses EDI to sell and to manage its UNE-P customers. We do not have the capability today to place an EDI order for total services resale. That would require us to build a new operational support systems ("OSS") interface, and we would not be able to build that interface for a single central office.

9. In addition, MCI is unable to service its existing customer accounts. During the past week, MCI attempted to process maintenance orders through Verizon's graphical user interface, or GUI. MCI received "rejects" stating "Product not available, unable to process request." When MCI contacted Verizon, a representative stated that it will not allow any maintenance transactions on MCI's customer lines unless they are converted to resale. However, MCI does not have the current ability to convert an order to resale.

10. In addition to the order processing and maintenance problems caused by Verizon's refusal to continue to provide unbundled switching out of its Mount Vernon switch, MCI and its customers will be harmed to the extent that the charges for Verizon's resale products are higher than the rates charged for Verizon's UNE-P product offering.

FURTHER AFFIANT SAYETH NAUGHT.

Sherry Lichtenberg