

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

Policy Statement to Review State	)	
Universal Service Policies	)	DOCKET UT-100562
	)	
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**VERIZON'S COMMENTS TO WITA'S USF CONCEPT PAPER**

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WITA's USF Concept Paper filed on September 1, 2010, presumes that a state universal service fund ("USF") is established, and then describes how the fund would be implemented. Verizon<sup>1</sup> does not support establishing a state USF as it has repeatedly stated in its written and oral comments in this proceeding and, therefore, does not support the proposals contained in WITA's USF Concept Paper. As Verizon and others have stated, establishing a state USF in Washington is unnecessary and inappropriate. Moreover, offering intrastate access charge reform in Washington does not warrant the creation of such a fund.

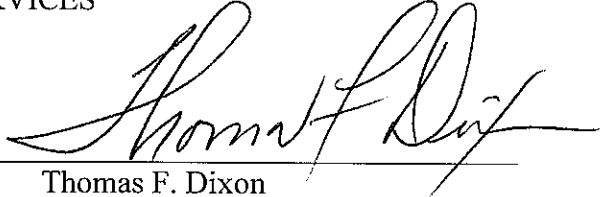
While Verizon agrees that intrastate access charge reform in Washington is appropriate, such reform should not be linked to creation of a state USF because the use of such a fund would allow companies to continue recovering a disproportionate amount of their costs from other providers and their customers – and it will be Washington consumers that will be burdened with paying a state USF the surcharge on top of the current federal USF assessment.

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<sup>1</sup> The Verizon entities submitting these reply comments are MCImetro Access Transmission Services LLC d/b/a Verizon Access Transmission Services and MCI Communications Services, Inc. d/b/a Verizon Business Services (collectively "Verizon").

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