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February 3, 2006

VIA ELECTRONIC FILING and OVERNIGHT MAIL

Ms. Carole Washburn
Secretary
Washington Utilities & Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

Re: *In the Matter of the Joint Application of Verizon Communications, Inc. and MCI Inc. for Approval of Agreement and Plan of Merger - Docket No. UT-050814;*
REMOVAL OF MCI-AFFILIATED FIBER-BASED COLLOCATION
ARRANGEMENTS FROM VERIZON WIRE CENTER CLASSIFICATION
FOLLOWING THE VERIZON/MCI MERGER

Dear Ms. Washburn:

In accordance with voluntary commitments made by Verizon Communications Inc. (“Verizon”) in connection with the FCC-approved Verizon/MCI Merger, within thirty days of the Merger Closing Date, Verizon agreed to issue an update to its initial wire center list (*i.e.*, the list effective 3/11/05) that, in applying the criteria established by the FCC in the *TRO Remand Order*,¹ excludes fiber-based collocation arrangements established by MCI or its affiliates from *all* of Verizon’s wire centers. The Verizon/Merger closed on January 6, 2006, and Verizon made its compliance filing with the FCC on February 3, 2006.

Pursuant to the Commission’s order in *In the Matter of the Joint Application of Verizon Communications, Inc. and MCI Inc. for Approval of Agreement and Plan of Merger*, Docket No. UT-050814, Verizon is filing the attached confidential wire center information that reflects the removal of the MCI-affiliated fiber-based collocation arrangements from the data that was the basis for Verizon’s prior identification of two wire centers in Washington State as having met the FCC’s non-impairment criteria. In its initial wire center list that took effect on March 11, 2005, Verizon identified BOTHWAXB (BOTHELL SIMONDS ROAD 4) as a Tier 2 wire center and RDMDWAXA (REDMOND) as a Tier 1 wire center. As the accompanying attachment shows,

¹ Order on Remand in WC Docket No. 04-313 and CC Docket No. 01-338, released on February 4, 2005 (the “*TRO Remand Order*”).

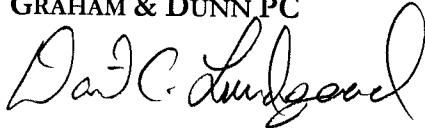
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the removal of the MCI-affiliated fiber-based collocation arrangements has no impact on those wire center classifications.²

Very truly yours,

GRAHAM & DUNN PC



David C. Lundsgaard

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² The BOTHWAXB wire center meets the FCC's Tier 2 criteria because ARMIS data available as of March, 11, 2005, showed that it exceeded the total number of business lines (24,000) required to meet the FCC's Tier 2 criteria. Therefore, the removal of MCI-affiliated fiber-based collocation arrangements in that office has no impact on that wire center's qualification as Tier 2. In the case of the RDMDWAXA wire center, the removal of the MCI-affiliated fiber-based collocation reduced the total number of eligible fiber-based collocation arrangements in that wire center to five, which still exceeds the four that are required in order for a wire center to meet the FCC's Tier 1 criteria.