

December 6, 2001

Carole J. Washburn
Executive Secretary
Washington Utilities
and Transportation Commission
PO Box 47250
Olympia, WA 98504-2750

RE: Response to Notice dated November 27, 2001
Docket No UT-003013; UT-011219

Dear Ms. Washburn:

On November 27, 2001, the Commission requested parties to provide written comment addressing whether the Commission should broaden the scope of issues in Docket UT-011219 to include the establishment of a Verizon SGAT. By submitting comments on the scope of that proceeding, Staff is not intending to indicate whether it will seek party status in the proceeding, but reserves that determination to a later time. If the Commission determines to conduct a comprehensive review of terms and conditions for Verizon's wholesale interconnection offerings (which Staff supports), Staff believes the Commission should conduct the review using the workshop format, and not conduct the proceeding as a contested case.

Staff comments further as follows:

Staff believes that broadening the scope of that docket is the easiest and most efficient way of conducting a comprehensive review of the terms and conditions for Verizon's wholesale interconnection offerings.

Staff has two concerns regarding the current status of the terms and conditions for Verizon. First, at the conclusion of the Qwest 271/SGAT proceeding the Commission will have thoroughly reviewed the terms and conditions offered by only one of the two major national incumbent local exchange companies operating in Washington. This creates the potential for significant disparity in the regulation of the two companies, since Qwest may be held to a higher standard of competitive access than Verizon, yet their duties under Sec. 251 are identical. The disparate treatment of Qwest and Verizon also

could result in operational problems for competitive local exchange companies attempting to offer service in markets that are served by both incumbents.

Second, a comprehensive review is necessary to ensure that the uniform, pro-competitive terms and conditions that Verizon offers CLECs in other states, particularly the growing number of states where Verizon has met the market-opening requirements of Sec. 271, are also offered to CLECs in Washington. While in theory this objective could be met by having CLECs "import" interconnection agreements from other states, in practice Verizon has objected in the one instance where a CLEC has attempted this approach.

For these reasons, the Staff urges the Commission to broaden the scope of Docket UT-011219 to encompass all Verizon terms and conditions.

If you have any questions or need further information, please do not hesitate to call.

Very truly yours,

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