

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale	) ) ) )	Docket No. UT-960369
In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for	) ) ) )	Docket No. UT-960370
U S WEST COMMUNICATIONS, INC.	) ) )	
In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for	) ) ) )	Docket No. UT-960371
GTE NORTHWEST INCORPORATED	)	

**GTE NORTHWEST INCORPORATED'S MOTION FOR RECONSIDERATION  
AND CLARIFICATION OF THE COMMISSION'S 25<sup>TH</sup> SUPPLEMENTAL ORDER**

GTE Northwest Incorporated ("GTE"), by counsel, respectfully moves the Commission for reconsideration and clarification of certain aspects of its 25<sup>th</sup> Supplemental Order (the "Order").

A. Interim Collocation Rates

GTE requests that the Commission reconsider its requirement that the Company file a compliance collocation study. Instead, GTE asks that its interim rates contained in its interconnection agreements remain in effect pending a final order in UT-003013. GTE's interconnection agreements incorporate by reference GTE's federal collocation tariff. During Phase II of this proceeding, GTE requested that the Commission adopt interim collocation rates based on its federal tariff then in effect. The Commission agreed, and adopted the cost study underlying GTE's federal tariff with slight modifications. When the November 1999 compliance filing was made, it was still essentially identical to GTE's federal tariff and the underlying cost

support. In the intervening seven months, however, FCC and federal court rulings have resulted in substantial changes to the cost methodology and resulting rates. Consequently, GTE has significantly modified its federal tariff and the Washington Compliance filing no longer reflects the federal tariff nor the way the Company calculates or recovers collocation costs from CLECs.

As GTE noted in Phase II of this proceeding, “[t]o avoid arbitrage opportunities, federal and state collocation rate structures should be consistent.” GTE Phase II Post-Hearing Brief at 69-70. It was for this reason that GTE filed the cost study supporting its federal tariff in Phase I, and sought interim rates based on that study. By tying interim rates to that outdated study — even with the Commission’s latest modifications — the Commission will create the very arbitrage it sought to avoid. The interim rates established in the Company’s interconnection agreements automatically incorporate the modified federal tariff and the recently filed collocation study in UT-003013 does the same. Therefore, GTE requests that the Commission reconsider its order that GTE resubmit another modification to this out-dated compliance filing.

B. Modifications to the Compliance Collocation Building Modification Charge

If the Commission continues down its current path, and sets interim collocation rates based on GTE’s Compliance Study, GTE requests that it reconsider its requirement that the Company proportionately distribute building modification costs according to the total space available for collocation. Order at ¶147. The Commission’s ordered rate structure assumes that all available collocation space in Washington has been identified, and that the total cost for collocation in every Washington central office is known. This is not the case. Obtaining such information would require a physical inventory of each central office, which is not practical and would be a substantial waste of resources.

GTE offers the following alternative building modification rate methodology. After removal of chain link wire costs, only two building modification costs remain — card access and HVAC. GTE proposes that for card access, the total cost be divided by the forecasted number of CLECs per central office and GTE itself. GTE estimates three CLECs will collocate in a central office, and therefore recommends dividing the card access costs by four to develop a proportionate rate. Since the HVAC costs and rates are developed per 100 square foot cage, a CLEC will only pay for HVAC based on the size of their collocation space. Therefore, GTE's compliance filing already recovers these costs in proportion to the amount of space a CLEC uses.

GTE's alternative rate proposal meets the Commission's goal of recovering costs from the CLECs in proportion to the space used without imposing a heavy administrative burden on the Company. Moreover, GTE's alternative proposal coincides with the method adopted in GTE's approved federal collocation tariff.

C. Clarification of Interim Local Number Portability Receiving Rate

GTE finds the Commission's ordered recurring rate for interim local number portability (ILNP) confusing. The Commission appears to have set a permanent rate of \$1.73. Order at ¶75. However, the Commission states that it expects the CLECs to provide ILECs with data to establish an INLP rate. *Id.* at ¶77. If the Commission has established a permanent recurring INLP price of \$1.73 based on the "New York method" for cost recovery, GTE can only assume the required cost allocation resulted in the \$1.73 rate, and is uncertain what is left for the companies to do.<sup>1</sup> Consequently, GTE requests that the Commission clarify what recurring rate

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<sup>1</sup> GTE does not believe \$1.73 is the appropriate rate since it does not recover all INLP costs. However, GTE can only assume, given the Commission's Orders, that this is the rate that it must charge.

it intends GTE to charge for INLP, and what the Company is required to do to comply with ¶77 of the Order.

WHEREFORE, GTE Northwest Incorporated respectfully requests that the Commission reconsider its requirement that the Company resubmit its compliance collocation study, and instead allow the interim rates contained in the company's interconnection agreements to remain in effect pending a final order in Docket UT-003013. Alternatively, GTE requests that the Commission reconsider its required methodology for developing building and modification rates and adopt GTE's alternative proposal. Finally, GTE requests that the Commission clarify the recurring rate it intends GTE to charge for INLP.

Respectfully submitted,

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Dated: May 30, 2000

**CERTIFICATE OF SERVICE**

I hereby certify that an original and 19 copies of GTE Northwest Incorporated's Motion for Reconsideration and Clarification were sent by fax and overnight mail to Carole J. Washburn, Secretary, Washington Utilities and Transportation Commission, 1300 S. Evergreen Park Drive, S.W., Olympia, Washington 98504-7250 and to parties below by fax and regular mail. A courtesy copy was sent by electronic mail to the presiding officer and the Commission's consultant, Dr. Gable.

DATED this 30th day of May, 2000.

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