



600 University Street, Suite 3600  
Seattle, Washington 98101  
main 206.624.0900  
fax 206.386.7500  
www.stoel.com

December 16, 2004

HEIDI L. WILDER  
Direct (206) 689-8703  
hlwilder@stoel.com

**VIA E-MAIL AND FEDERAL EXPRESS**

Ms. Carole Washburn, Executive Secretary  
Washington Utilities & Transportation Committee  
1300 Evergreen Park Drive, SW  
Olympia, WA 98504

**Re: Docket No. UT-041127**

Dear Ms. Washburn:

Please find enclosed an original and seven copies of Verizon's Objections to MCI's Third Set of Data Requests and a Certificate of Service.

Please contact us if you have any questions, and thank you in advance for your assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Veronica Moore".

Veronica Moore  
Assistant to Timothy J. O'Connell

Enclosures

cc: ALJ Ann Rendahl  
Parties of Record

BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION

|                         |   |                                |
|-------------------------|---|--------------------------------|
| In the Matter of        | ) |                                |
|                         | ) | DOCKET NO. UT-041127           |
| THE JOINT PETITION FOR  | ) |                                |
| ENFORCEMENT OF          | ) |                                |
| INTERCONNECTION         | ) | <b>VERIZON'S OBJECTIONS TO</b> |
| AGREEMENTS WITH VERIZON | ) | <b>MCI's THIRD SET OF DATA</b> |
| NORTHWEST INC.          | ) | <b>REQUESTS</b>                |
| _____                   | ) |                                |

**VERIZON'S OBJECTIONS TO MCI's THIRD SET OF DATA REQUESTS**

Verizon Northwest Inc. (Verizon) hereby responds to the Third Set of Data Requests issued by MCI Metro Access Transmission Services, LLC ("MCI") as follows;

1. Verizon objects to MCI's unilateral attempt to require responses to these data requests before the time established by WAC 480-07-405(7)(a).
2. Verizon objects to MCI's Third Set of Data Requests because Order No. 2 in this matter dismisses Petitioners' case with prejudice. MCI's Third Set of Data Requests are also unduly burdensome, oppressive and irrelevant on their merits. MCI's Third Set of Data Requests are therefore unduly burdensome, oppressive and seek information irrelevant to this proceeding.

Dated December 16, 2004,

Respectfully submitted,



Timothy J. O'Connell

John H. Ridge

STOEL RIVES LLP

One Union Square

600 University St., Suite 3600

Seattle, WA 98101

(206) 624-0900

(206) 386-7500

Counsel for Verizon Northwest Inc.

## CERTIFICATE OF SERVICE

I hereby certify that I have this 16th day of December, 2004, served the true and correct original, along with the correct number of copies, of *Verizon's Objections to MCI's Third Set of Data Requests* and a *Certificate of Service* upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn, Executive Secretary  
Washington Utilities & Transportation  
Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98503-7250

Hand Delivered  
 U.S. Mail (1<sup>st</sup> class, postage prepaid)  
 Overnight Mail  
 Facsimile (360) 586-1150  
 Email (records@wutc.wa.gov)

I hereby certify that I have this 16th day of December, 2004, served a true and correct copy of the foregoing documents upon parties noted below via E-Mail and U.S. Mail:

MICHAEL E. DAUGHTRY  
United Communications, Inc., d/b/a UNICO  
389 SW Scalehouse Court  
Bend, OR 97702

Email: mike@ucinet.com

LETTY FRIESEN  
Attorney at Law  
AT&T Communications of the Pacific North  
1875 Lawrence Street, Floor 15  
Denver, CO 80202

Email: lsfriesen@att.com

Donald Taylor, Director  
Carriers Relationso & Regulatory Affairs  
Tel West Communications, L.L.C.  
3701 South Norfolk St., Suite 300  
Seattle, WA 98118  
Email: dtaylor@Telwestservices.com

JUDITH ENDEJAN, ATTORNEY  
Graham & Dunn PC  
Representing Verizon Northwest, Inc.  
Pier 70, Suite 300  
2801 Alaskan Way  
Seattle, WA 98121-1128  
Email: jendejan@grahamdunn.com

BROOKS HARLOW  
Miller Nash LLC  
Representing Advanced TelCom, Inc.  
4400 Two Union Square  
601 Union Street  
Seattle, WA 98101-2352  
Email: brooks.harlow@millernash.com

David Mittle  
Law Office of David E. Mittle  
208 Maynard  
Santa Fe, NM 87501

Email: dmittle@att.net

MICHEL SINGER NELSON  
Worldcom, Inc.  
Representing MCI metro Access  
Transmission  
707 17<sup>th</sup> St., Suite 4200  
Denver, CO 80202  
Email: michel.singer\_nelson@mci.com

DAVID RICE  
Miller Nash LLC  
Representing Advanced TelCom, Inc.  
4400 Two Union Square  
601 Union Street  
Seattle, WA 98101-2352  
Email: david.rice@millernash.com

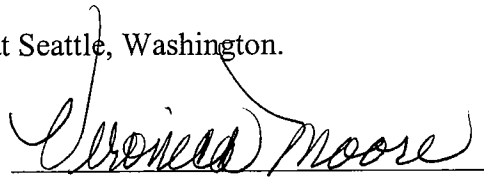
I hereby certify that I have this 16th day of December, 2004, served a true and correct copy of the foregoing documents upon parties noted below via U.S. Mail:

MCIMETRO TRANSMISSION ACCESS  
CORP.  
707 17<sup>th</sup> St., Suite 3600  
MCI Tower  
Denver, CO 80202

AT&T COMMUNICATIONS OF THE  
PACIFIC NORTH  
2120 Caton Way S.W., Suite B  
Olympia, WA 98502

I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

DATED this 16th day of December, 2004, at Seattle, Washington.

  
Veronica Moore