

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for Arbitration of an
Amendment to Interconnection Agreements of

VERIZON NORTHWEST INC.

with

COMPETITIVE LOCAL EXCHANGE CARRIERS
AND COMMERCIAL MOBILE RADIO SERVICE
PROVIDERS IN WASHINGTON

Pursuant to 47 U.S.C. Section 252(b), and the
Triennial Review Order.

DOCKET NO. UT-043013

RESPONSE OF SPRINT
COMMUNICATIONS
COMPANY L.P.

**RESPONSE OF SPRINT TO VERIZON'S MOTION TO HOLD PROCEEDING IN
ABEYANCE UNTIL JUNE 15, 2004**

1 Sprint Communications Company L.P. ("Sprint") respectfully submits this
Response to Verizon Northwest Inc.'s ("Verizon") Motion to Hold Proceeding in
Abeyance Until June 15, 2004 ("Motion"). Sprint does not oppose Verizon's Motion,
subject to two conditions.

2 Sprint requests that the Commission rule on Sprint's Motion to Dismiss before
issuing a ruling on Verizon's Motion. By dismissing Verizon's Petition, the
Commission will satisfy the objective set forth in Verizon's request for an abeyance;
ensuring that "parties will be able to devote their attention to commercial negotiations

without the distraction of simultaneous litigation.”¹ Thus, if the Commission grants Sprint’s Motion to Dismiss, it will be unnecessary to rule on Verizon’s Motion.

3 Sprint also requests that, if the Commission does not dismiss Verizon’s Petition, it require Verizon to maintain the *status quo*, especially for UNE platform. Sprint asks that the Commission hold Verizon to the rates and terms contained in Verizon’s filed interconnection agreements, while the arbitration is pending.

4 It is critically important for the Commission to require Verizon to maintain the *status quo*, under existing rates and terms. Verizon’s Motion raises additional uncertainty about the availability of UNE-P, as well as the availability of high capacity UNE loops and dedicated transport,² after June 15, 2004. Allowing Verizon to unilaterally change the terms of its interconnection agreements, without permission from the Commission, and in light of the already high level of regulatory uncertainty, will result in unstable and harmful conditions for telecommunications providers and customers in Washington. The Commission can mitigate this uncertainty and prevent harm by maintaining the *status quo* while Verizon’s arbitration is pending.

5 The Public Utility Commission of Texas recently granted SBC’s motion to hold arbitration of interconnection agreements in abeyance based, in part, on SBC’s assurances that it will continue to offer those arrangements in accordance with existing agreements.³ Verizon should be required to do the same in this case until the arbitration is completed, if the Commission does not dismiss it.

6 Therefore, Sprint asks the Commission to rule on Sprint’s Motion to Dismiss before granting Verizon’s Motion. Sprint further ask the Commission, should it decide to proceed with the arbitration, to only grant Verizon’s Motion on the condition that

¹ Verizon Motion, at page 2.

² Much discussion has occurred in the press regarding commercial negotiations for UNE-P. However, Verizon currently provides other UNEs under the terms of its interconnection agreements.

³ Public Utility Commission of Texas, Docket No. 28821, *Arbitration of Non-Costing Issues for Successor Interconnection Agreements to the Texas 271 Agreement*, Order Abating Proceeding dated May 5, 2004 at 1. A copy of this Order is attached.

Verizon provide interconnection arrangements, and UNE platform in particular, in accordance with existing interconnection agreements as they are currently filed.

Respectfully submitted this 17th day of May 2004.

By:  _____

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ARBITRATION OF NON-COSTING
ISSUES FOR SUCCESSOR
INTERCONNECTION AGREEMENTS
TO THE TEXAS 271 AGREEMENT

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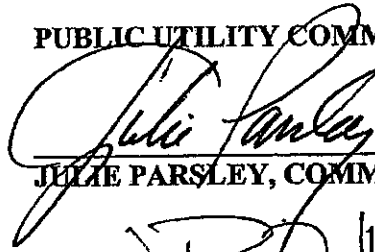
PUBLIC UTILITY COMMISSION
FILING CLERK
OF TEXAS

ORDER ABATING PROCEEDING

This Order grants the motion filed by Southwestern Bell Telephone, L.P. d/b/a SBC Texas to abate this proceeding for sixty days to enable further business-to-business contract negotiations. In accordance with the assurances made by SBC that: 1) the T2A and T2A-based agreements will be extended; 2) procedural dates will be extended by sixty days; 3) agreements will be extended for those parties not participating in this proceedings but who intend to opt-in to an interconnection agreement resulting from this proceeding; and 4) that UNEs will continue to be offered consistent with those agreements, this proceeding is abated, and a revised procedural schedule will be developed. The deadline for processing this case is extended for sixty days from the date of this Order.

SIGNED AT AUSTIN, TEXAS the 5th day of May 2004.

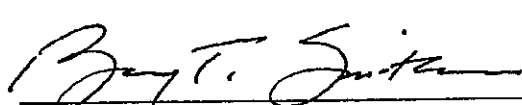
PUBLIC UTILITY COMMISSION OF TEXAS



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PAUL HUDSON, CHAIRMAN



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