

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Review of:	)	
Unbundled Loop and Switching Rates;	)	Docket No. UT-023003
the Deaveraged Zone Rate Structure; and	)	
Unbundled Network Elements,	)	AFFIDAVIT OF RICHARD
Transport and Termination	)	CHANDLER
(Recurring Costs)	)	
_____	)	

I, Richard Chandler, remaining under the oath I took during the evidentiary hearings on June 2, 2004, state as follows:

1. I was asked to accept, subject to check, that in the Virginia Arbitration proceeding before the FCC Wireline Competition Bureau, AT&T in rebuttal testimony addressing the split between traffic sensitive and non-traffic sensitive switching costs “changed its split from 16% to 16% traffic sensitive, 84% non-traffic sensitive,” and that “on surrebuttal in that same proceeding, AT&T again changed its split to 23% traffic sensitive and 77% non-traffic sensitive.” Tr. at 1118. I was out of the country immediately following the hearings in this proceeding, and I have only recently returned and been able to attempt check these statements.

2. As I testified at the hearing, I did not participate in the Virginia Arbitration, and I have no personal knowledge of the evidence presented, or positions taken, by AT&T in that proceeding. Accordingly, I arranged to consult with AT&T personnel who are familiar with that case and to obtain copies of the testimony related to the statements I was asked to accept subject to check. I was informed that AT&T’s direct testimony was in support of the Synmod switch mix, while AT&T’s reply testimony addressed the Verizon SCIS-based switch cost study, and

AT&T's surrebuttal testimony responded to additional information provided by Verizon in reworking Verizon's switching cost study. My understanding based on consulting with AT&T personnel, therefore, is that the different splits between traffic sensitive and non-traffic sensitive switching costs reflected in AT&T's testimony in the Virginia arbitration was the result of analyzing different cost models and their results, not a fluctuation in AT&T's position.

3. I was unable, however, to review the relevant portions of AT&T's reply and surrebuttal testimony because they contain confidential information that is subject to a protective order. Consequently, I cannot check or accept the Verizon representations quoted above with respect to that testimony and AT&T's position.

Dated this 25th day of June, 2004, at Denver, Colorado.



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Richard Chandler