

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,)	AT&T RESPONSE TO
Transport and Termination)	VERIZON MOTION FOR
(Recurring Costs))	EXTENSION OF PAGE
_____)	LIMITATIONS

AT&T Communications of the Pacific Northwest, Inc. (“AT&T”), provides the following response to the Motion of Verizon Northwest Inc. (“Verizon”) for Extension of Page Limitations for Initial Post-Hearing Brief (“Motion”). AT&T opposes extending the page limitations beyond 75 pages.

DISCUSSION

1. The Commission has traditionally extended the page limits for opening briefs in cost docket proceedings to 100 pages. Verizon, however, has requested 125 pages for its brief, allegedly to have “a complete opportunity to comment on and respond to the large amount of testimony and exhibits at issue,” Motion at 1, and “to respond to all parties’ positions, each of which criticizes Verizon’s studies.” Motion at 2. No such extension is warranted. Indeed, even the 100 page limit the Commission has authorized in prior cost proceedings is unnecessary.

2. Prior cost docket proceedings have addressed costs for both Verizon and Qwest Corporation (“Qwest”), have examined as many as four cost models, and have involved multiple actively participating parties. This proceeding, in sharp contrast, focuses solely on Verizon’s costs, considers two cost models, and involves only three actively participating parties – Verizon, AT&T, and Commission Staff. Verizon and AT&T submitted the vast majority of the testimony and exhibits, and Verizon submitted most of that. Verizon cannot credibly claim under these circumstances that it needs

more than twice the number of pages for its opening brief authorized in the Commission's rules.

3. AT&T nevertheless believes that a short extension of the page limits would be beneficial for the Commission and the parties. Verizon has submitted a new cost model, the Federal Communications Commission ("FCC") has established a new standard for determining cost of capital, and the Commission has expanded the brief outline to include issues that the parties had not necessarily contemplated addressing in any detail. Accordingly, AT&T proposes that the Commission extend the page limits for opening briefs to 75 pages.

CONCLUSION

For the foregoing reasons, the Commission should not extend the page limits for opening briefs beyond 75 pages.

DATED this 2nd day of July, 2004.

DAVIS WRIGHT TREMAINE LLP
Attorneys for AT&T Communications of the
Pacific Northwest, Inc.

By _____
Gregory J. Kopta