



# Davis Wright Tremaine LLP

ANCHORAGE BELLEVUE LOS ANGELES NEW YORK PORTLAND SAN FRANCISCO SEATTLE WASHINGTON, D.C. SHANGHAI

MELISSA K. GERAGHTY  
DIRECT: (206) 628-7593  
melissageraghty@dwt.com

2600 CENTURY SQUARE  
1501 FOURTH AVENUE  
SEATTLE, WA 98101-1688

TEL (206) 622-3150  
FAX (206) 628-7699  
www.dwt.com

July 6, 2004

Ms. Carole J. Washburn  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

Re: Docket No. UT-023003; Affidavit of Richard Chandler

Dear Ms. Washburn:

Enclosed please find the original Affidavit of Richard Chandler. The copies of this document were sent to the Commission for filing in the above-referenced docket on June 25, 2004.

Please contact me if you have any questions about this filing.

Very truly yours,

Davis Wright Tremaine LLP

Melissa K. Geraghty  
Assistant to Gregory J. Kopta

Enclosure

RECEIVED  
04 JUL -7 AM 8:45  
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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:

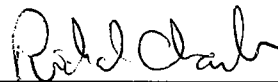
1. I was asked to accept, subject to check, that in the Virginia Arbitration proceeding before the FCC Wireline Competition Bureau, AT&T in rebuttal testimony addressing the split between traffic sensitive and non-traffic sensitive switching costs “changed its split from 16% to 16% traffic sensitive, 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