



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

March 28, 2006

TIMOTHY J. O'CONNELL
Direct (206) 386-7562
tjoconnell@stoel.com

VIA ELECTRONIC AND U.S. MAIL

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

Re: Docket No. UT-053025

Dear Ms. Washburn:

Please accept this letter as the response of Verizon Northwest Inc. (“Verizon”) to the comments filed by Public Counsel in this docket on March 21, 2006. This response is not a reply requiring leave for its submission because this proceeding is not adjudicative in nature. Public Counsel’s comments went beyond the issues raised in the objections previously made by the Joint CLECs in this proceeding, and should be disregarded altogether. Verizon does not seek leave to file a sur-reply to the reply of the Joint CLECs; although Verizon disagrees with much of that reply, it does not appear to raise new issues warranting a sur-reply. In any event, to the degree that the Commission considers Public Counsel’s inappropriate filing, Verizon requests that the Commission accept this response to that filing.

Two aspects of Public Counsel’s comments are particularly troublesome. First, Public Counsel refers to a “two step process” of which Verizon is unaware. The Commission requested that the incumbent carriers provide certain information, which they have done. It afforded the competitive carriers the opportunity to review that information and raise objections, and for the ILECs to respond. These steps have been completed, and the matter is now before the Administrative Law Judge overseeing this investigation for a decision. There were no additional steps contemplated – much less established – in this proceeding.

Second, Public Counsel suggests that the scope of this investigation should be broadened beyond the pending investigation of non-impaired wire centers. For all the reasons explored in the workshop of February 1, 2006, such a free-ranging inquiry is inappropriate. No party has identified any convincing rationale why this Commission should attempt to overrule or circumvent the decisions carefully reached by the FCC in the *TRRO*.

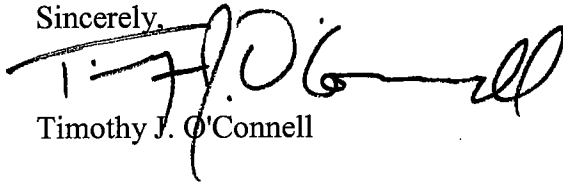
Oregon
Washington
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Utah
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Once the examination of wire centers in Washington designated by the incumbents as non-impaired is completed, this investigation should cease.

Sincerely,



Timothy J. O'Connell

cc: Service List

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

*In the Matter of the investigation
concerning the status of competition and
impact of the FCC's Triennial Review
Remand Order on the competitive
telecommunications environment in
Washington State*

Docket No. UT-053025

CERTIFICATE OF SERVICE

I hereby certify a true and correct copy of the letter submitted to Carole Washburn, Executive Secretary, Washington Utilities and Transportation Commission was sent to each of the parties of record shown on the attached service list in sealed envelopes, via:

- Hand Delivered
- U.S. Mail (first-class, postage prepaid)
- Overnight Mail
- Facsimile
- Email

DATED: March 28, 2006.



Veronica Moore

Docket No. UT-053025
UT-053025 STATUS OF COMPETITION INVESTIGATION

SERVICE LIST

Carolyn Hammack
Qwest Corporation
1801 California Street, Suite 4750
Denver, CO 80202

Lisa Anderl
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle, WA 98191

Dave Teitzel
Qwest Corporation
1600 7th Avenue, Room 3214
Seattle, WA 98191

Mark Reynolds
Qwest Corporation
1600 7th Avenue, Room 3206
Seattle, WA 98191

Karen J. Johnson
Integra Telecom of Washington Inc.
Suite 500
1201 NE Lloyd Boulevard
Portland, OR 97232

Jay Nusbaum
Integra Telecom of Washington Inc.
Suite 500
1201 NE Lloyd Boulevard
Portland, OR 97232

Rex Knowles
XO Oregon, Inc.
111 E. Broadway, Suite 1000
Salt Lake City, UT 84111

Gregory J. Kopta
Davis Wright Tremaine LLP
1501 4th Avenue, Suite 2600
Seattle, WA 98101-1688

Thomas D. Ellis
TSS Digital Services, LLC
Suite 205
525 Columbia Street NW
Olympia, WA 98501

Gregory Diamond
Covad Communications Company
7901 Lowry Blvd.
Denver, CO 80230

Sarah E. Wallace
Davis Wright Tremaine LLP
1501 4th Avenue, Suite 2600
Seattle, WA 98101-1688

Simon J. ffitich
Attorney General of Washington
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012

Ethan Sprague
Pac-West Telecom, Inc.
1776 W. March Lane, Suite 250
Stockton, CA 95207

Arthur Butler
Ater Wynne LLP
601 Union Street, Suite 5450
Seattle, WA 98101

Karen Clauson
Eschelon Telecom, Inc.
730 Second Avenue South,
Suite 1200
Minneapolis, MN 55402

Douglas Denney
Eschelon Telecom, Inc.
730 Second Avenue South,
Suite 900
Minneapolis, MN 55402

David Mittle
Law Office of David Mittle
208 Mynard
Santa Fe, NM 87501

Jack Pestaner
Tel-West Central Services (T480)
133 La Placita Ct.
Santa Fe, NM 87505

Dennis Robbins
Electric Light Wave
4400 NE 77th Avenue
Vancouver, WA 98662-6706

Judith Krebs
Attorney General of Washington
900 Fourth Avenue, Suite 2000
Seattle, WA 98164-1012

Sally Johnston
Jon Thompson
Attorney General of Washington
1400 S. Evergreen Park Dr SW
Olympia, WA 98504