



RIVERFRONT PLAZA, EAST TOWER
951 EAST BYRD STREET
RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200
FAX 804 • 788 • 8218

JENNIFER L. MCCLELLAN
DIRECT DIAL: 804-788-8571
EMAIL: jmcclellan@hunton.com
FILE NO: 53470.1711

July 10, 2002

BY ELECTRONIC AND OVERNIGHT MAIL

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

Docket No. UT-003013 Part E/UT-023003

Dear Ms. Washburn:

Pursuant to the Washington Utility and Transportation Commission's ("Commission") July 2, 2002 Notice of Opportunity to File Comments, Verizon Northwest Inc. ("Verizon NW"), by counsel, hereby submits its comments regarding (i) review of rates established in Docket UT-003013 and (ii) issues to be addressed at the July 11, 2002 UT-003013 Part E Pre-hearing Conference.

Docket UT-003013 has demonstrated the difficulty of establishing unbundled network element ("UNE") rates based on different cost models through bifurcated proceedings at different points in time. To ensure the Commission does not run the risk of establishing inconsistent UNE rates, Verizon NW proposes that UT-003013 Part E be limited to updated OSS cost recovery issues, and that the Commission revisit all UNE rates, with the exception of xDSL related rates (line sharing, line splitting and packet switching)¹ in UT-023003. Doing so

¹ For the reasons outlined in Verizon NW's Motion for Reconsideration and Clarification of the 32nd Supplemental Order in UT-003013, Verizon NW recommends that the Commission defer any further consideration of rates for line sharing, line splitting, and packet

(continued...)

Ms. Carole J. Washburn
July 12, 2002
Page 2

will allow the Commission to use one costing methodology to set rates, thereby avoiding any discrepancy between related rates.

Please contact me if you have any questions.

Sincerely yours,

A handwritten signature in black ink that reads "Jennifer L. McClellan". The signature is written in a cursive style with a large initial "J" and "M".

Jennifer L. McClellan

cc: Lawrence Berg, Administrative Law Judge
Ms. Patty Nelson
W. Jeffery Edwards, Esq.
Service List

switching until such time as the Federal Communications Commission issues new rules consistent with the D.C. Circuit opinion in *United States Telecom Association v. FCC*, 290 F.3d 415 (D.C.Cir. 2002).