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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Complaint of:  
  
THE LUMMI NATION, Complainant,  
  
v.  
  
VERIZON NORTHWEST;  
QWEST CORPORATION, Respondents

Docket No. UT-060147  
  
VERIZON NORTHWEST INC.'S  
ANSWER

Respondent Verizon Northwest Inc. (“Verizon”) answers the Complaint of complainant The Lummi Nation (“Lummi”) by admitting, denying, and alleging as follows. Any allegations not specifically admitted are denied.

**1. PARTIES**

1.1 In answer to paragraph 1.1, respondent lacks sufficient knowledge or information to form a belief as to the truth of the allegations that the Lummi Nation does business as the entities listed in this paragraph or that the Lummi Nation is a body politic and governmental unit, and therefore denies the same. Verizon admits that it billed the Lummi Nation for telecommunications services under Account # 55 9000 3914011086 01. The remainder of paragraph 1.1 fails to state allegations and therefore does not call for an answer.



1           3.1     Respondent admits the allegations in paragraph 3.1, as they relate to respondent  
2 solely. Respondent lacks sufficient knowledge or information to form a belief as to the truth of  
3 the allegations relating to Qwest, and therefore denies the same.

4           3.2     Respondent admits the allegations in paragraph 3.2, as they relate to respondent  
5 solely. Respondent lacks sufficient knowledge or information to form a belief as to the truth of  
6 the allegations relating to Qwest, and therefore denies the same.

7           3.3     The definition of "Foreign Exchange Service" set forth in paragraph 3.3 is  
8 incomplete and inaccurate, and is therefore denied.

9           3.4     In response to paragraph 3.4, respondent admits that FX Service requires active  
10 switching equipment on the part of one or more participating service providers. The remaining  
11 allegations are ambiguous and are therefore denied.

12          3.5     In response to paragraph 3.5, respondent admits that it provided foreign exchange  
13 type services to the Lummi Nation. The remaining allegations are ambiguous and are therefore  
14 denied.

15          3.6     In response to paragraph 3.6, respondent admits that, under certain conditions, FX  
16 Service permits some inter-exchange calls without incurring toll or long distance charges. The  
17 remaining allegations are ambiguous and are therefore denied.

18          3.7     Respondent denies the allegations in paragraph 3.7 relating to the Verizon Billing  
19 Telephone Numbers. Respondent lacks sufficient knowledge or information to form a belief as  
20 to the truth of the remaining allegations contained in paragraph 3.7, and therefore denies the  
21 same.

22          3.8     Respondent denies the allegations in paragraph 3.8 relating to the Verizon Billing  
23 Telephone Numbers. Respondent lacks sufficient knowledge or information to form a belief as  
24 to the truth of the remaining allegations contained in paragraph 3.8, and therefore denies the  
25 same.

26

ANSWER - 3









1 **CERTIFICATE OF SERVICE**

2 I hereby certify that I have this 14th day of February, 2006, served the true and correct  
3 original, along with the correct number of copies, of *Verizon Northwest Inc.'s Answer* upon the  
4 WUTC, via the method(s) noted below, properly addressed as follows:

5 Carole Washburn, Executive Secretary   X   Hand Delivered  
6 Washington Utilities & Transportation        U.S. Mail (1<sup>st</sup> class, postage prepaid)  
7 Commission        Overnight Mail  
8 1300 S. Evergreen Park Drive SW        Facsimile (360) 586-1150  
9 Olympia, WA 98503-7250        Email (records@wutc.wa.gov)

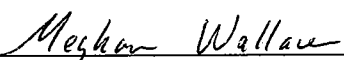
10 I hereby certify that I have this 14th day of February, 2006, served a true and correct copies  
11 of the foregoing documents upon parties noted below via E-Mail and U.S. Mail:

12 Margaret M. Schaff Judy Bush  
13 Margaret M. Schaff, PC Reservation Attorney  
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19 *Counsel for Lummi Nation* *Counsel for Lummi Nation*

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25 Phone: (206) 398-2500  
26 Email: lisa.anderl@qwest.com  
adam.sherr@qwest.com  
*Counsel for Qwest Corporation*

I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

DATED this 14th day of February, 2006, at Seattle, Washington.

  
Meghan Wallace  
Legal Secretary