

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

VERIZON SELECT SERVICES, INC.; MCIMETRO
ACCESS TRANSMISSION SERVICES, LLC; MCI
COMMUNICATIONS SERVICES, INC.;
TELECONNECT LONG DISTANCE SERVICES
AND SYSTEMS CO. D/B/A TELECOM USA; AND
TTI NATIONAL, INC.,

Complainants,

v.

UNITED TELEPHONE COMPANY OF THE
NORTHWEST,

Respondent.

Docket No. UT-081393

ANSWER OF UNITED

ANSWER

Pursuant to WAC 480-07-395, United Telephone Company of the Northwest d/b/a Embarq ("United"), files this Answer to the Complaint of Verizon Select Services, Inc.; MCImetro Access Transmission Services, LLC; MCI Communications Services, Inc.; Teleconnect Long Distance Services And Systems Co. D/B/A Telecom USA; and TTI National, Inc., (collectively "Verizon"). United's representatives in this proceeding are as follows:

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United answers the allegations in the Complaint as follows:

1. United lacks sufficient information to form a belief about the truth or falsity of the information in paragraphs 1 through 4.
2. United admits the allegations in paragraph 5.
3. United denies the allegations in paragraph 6.
4. United denies the allegations in paragraph 7, specifically as they relate to this complaint, but admits that the Commission generally has authority over complaints, rates, and pricing.

5. United denies the allegations in paragraph 8.

6. United denies the allegations in paragraph 9.

7. United admits in part and denies in part the allegations in paragraph 10.

United admits that Verizon Northwest Inc. ("Verizon NW), the incumbent local exchanged carrier affiliated with the complaining Verizon entities, recently underwent a review by the Commission. United denies all other allegations in paragraph 10.

8. United denies the allegations in paragraph 11.

9. United admits the allegations in paragraph 12.

10. United admits the allegations in paragraph 13.

11. United admits the allegations in paragraph 14.

12. United admits in part and denies in part the allegations in paragraph 15.

United admits that the Commission has required Qwest and Verizon NW to lower intrastate switched access rates. United denies all other allegations in paragraph 15, including any rationale offered in an attempt explain why the Commission reduced Qwest's and Verizon NW's intrastate switched access rates.

13. United denies the allegations in paragraph 16.

14. United admits in part and denies in part the allegations in paragraph 17. United admits that the Commission reduced Verizon NW's intrastate switched access rates, but denies any characterization of those reductions. United further admits that the language quoted from Commission orders is accurate, but denies the characterization and relevance of the language as alleged by Verizon.

15. United admits in part and denies in part the allegations in paragraph 18. United admits that the Commission made the cited statement in its order, but denies the relevance of the statement and the manner in which Verizon characterizes that statement. United denies all other allegations in paragraph 18.

16. United admits the allegations in paragraph 19.

17. United denies the allegations in paragraph 20.

18. United denies the allegations in paragraph 21.

19. United denies in part and admits in part the allegations in paragraph 22. United admits only the factual allegations regarding specific rate levels and denies all other allegations in paragraph 22.

20. United denies the allegations in paragraph 23.

21. United denies the allegations in paragraph 24.

22. United, with respect to paragraph 25, realleges and incorporates by reference its answers to the allegations in paragraphs 1-24 of Verizon's Complaint.

23. United denies the allegations in paragraph 26.

24. United, with respect to paragraph 27, realleges and incorporates by reference its answers to the allegations in paragraphs 1-26 of Verizon's Complaint.

25. United denies the allegations in paragraph 28.

26. United denies the allegations in paragraph 29.

27. United denies the allegations in paragraph 30.
28. United, with respect to paragraph 31, realleges and incorporates by reference its answers to the allegations in paragraphs 1-30 of Verizon's Complaint.
29. United denies the allegations in paragraph 32.
30. United denies the allegations in paragraph 33.
31. United admits the allegations in paragraph 34.
32. United admits the allegations in paragraph 35.
33. United denies the allegations in paragraph 36.
34. United lacks sufficient information upon which to form a belief about the truth or falsity of the information in paragraph 37.
35. United, with respect to paragraph 38, realleges and incorporates by reference its answers to the allegations in paragraphs 1-37 of Verizon's Complaint.
36. United denies the allegations in paragraph 39.
37. United denies the allegations in paragraph 40.
38. United denies the allegations in paragraph 41.
39. United denies the allegations in paragraph 42.
40. United denies the allegations in paragraph 43.
41. United denies that Verizon is entitled to the relief as requested in paragraph 44, or any other relief.

AFFIRMATIVE DEFENSES

42. Failure to State a Claim. The Complaint fails to state a claim upon which relief can be granted.

43. Single Issue Ratemaking. The Complaint seeks relief that would result in single-issue ratemaking.

WHEREFORE, having fully answered the Verizon's allegations, United asks the Commission to dismiss the Complaint.

Respectfully submitted this 18th day of August 2008.

By: 

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