## BEFORE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Review of:
Unbundled Loop and Switching Rates; the Deaveraged
Zone Rate Structure; and
Unbundled Network Elements, Transport,
and Termination

## **DECLARATION**

- 1. My name is MargaretMary McCready. My business address is 13100 Columbia Pike, Silver Spring, MD, 20904. My position is Executive Director Service Costs at Verizon Communications Inc. and I have been in this position since November 2003. One of my responsibilities is to supervise the compliance filings in Verizon's UNE cost cases.
- 2. Based on my experience and familiarity with the VzCost and HM 5.3 models, it is my opinion that Verizon cannot complete its compliance filing in Docket UT-023003 by February 22, 2004. This is so because the Twenty-Fourth Supplemental Order made numerous input changes that will take weeks to implement and document. Verizon NW also will be seeking clarification of a number of the Commission's findings because it is unclear how Verizon NW is to implement them.
- 3. Moreover, if Verizon is required to run HM 5.3, it will need access to the Commission's workpapers, and likely to other information in AT&T's possession -- e.g., the TNS data.

  Verizon is not in a position to finalize its compliance filings without this information.

I declare under penalty of perjury that the foregoing it true and correct.

Executed this 18th Day of February, 2005.

MargaretMary McCready