Exhibit No. ___-T (TWZ-1T)
Docket No. UT-051291
Witness: Timothy W. Zawislak

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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ERRATA TO TESTIMONY

OF

TIMOTHY W. ZAWISLAK

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

November 30, 2005

Revised December 9, 2005

1	 Third, the annual Directory Revenue Payment recommended by
2	Ms. Paula M. Strain should be recognized as part of this revenue
3	neutral rate rebalancing in order to ensure that local ratepayers
4	realize the intended benefits of such payments.
5	❖ Fourth, the Commission should require that United reduce its
6	interim terminating access charge (ITAC) from \$0.064851 down
7	to approximately \$0.031779 \$0.022616 per minute (i.e. by an
8	amount equal to the additional net revenue that the company
9	will realize as a net result of the first three items.
10	The rate restructuring coupled with the Directory Revenue Payment and
11	the ITAC decrease, are designed to produce no net change in intrastate revenue
12	to United (therefore "revenue neutral"). A table summarizing the various
13	revenue impacts can also be found on page 19 of this testimony.

VI	HNITED'S	TERMINATING	ACCESS CHARGES
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- 3 Q. What are United's intrastate terminating switched access charges?
- 4 A. Exhibit No. ___ (TWZ-3) also provides the relevant rates for this category along
- 5 with a comparison to Commission authorized Verizon rates as well as United's
- 6 current comparable interstate rates for the state of Washington.

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- Q. What does Staff recommend with regard to United's intrastate terminating
- 9 switched access charges?
- 10 A. Staff recommends that United's intrastate interim terminating access charge
- 11 (ITAC) be reduced from \$0.064851 down to approximately \$0.031779 \$0.022616.
- 12 This reduction is associated with the restructuring of United's local and switched
- access rates, and in conjunction with the Directory Revenue Payment. Staff's
- intent is to keep United's intrastate revenue neutral, in the context of this case.
- The estimated ITAC above is based on data from the twelve months
- ended December 31, 2004. However, the Commission should order United to file
- an updated rate (calculated in the same way) based on data from the twelve
- months ended December 31, 2005, which should be available by the time the
- 19 transaction closes.

	With an ITAC of approximately \$0.031779 \$0.022616 per minute I estimate that
	United can still support universal service without charging excessive intrastate
	access charges to its competitors.
Q.	Why should United reduce its ITAC as Staff recommends, when the result is
	an increase in local rates for some of United's customers?
A.	The ITAC should be reduced because today a portion of the ITAC revenues are
	being used to keep rates for some local customers of United lower than is
	necessary or reasonable.
	The sole purpose of the ITAC is to maintain rates in rural and high-cost
	areas that are affordable and reasonably comparable (i.e. universal service). This
	is a worthwhile goal, consistent with state and national policy, but United's
	current rate structure overshoots the mark. Rather than maintain rates in rural
	and high-cost areas that are equal to its rates elsewhere, United actually charges
	these areas lower rates. Customers in Poulsbo and Sunnyside pay \$16.40

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(residence) to \$32.10 (business), compared to rates in Stevenson of \$8.90

met with a lower ITAC than United's tariff currently mandates.

(residence) to \$17.85 (business). In short, the universal service objectives can be

- 4 Q. Please summarize the estimated revenue impacts for Staff's recommendations.
- 5 A. See the table inserted below for this summary:

(a)	(b)	(c)	(d)	(e)
		Current	Proposed	Annual Revenue
		<u>Price</u>	<u>Price</u>	<u>Impact (000's)</u>
1.a. Origina	ting Local Switching	\$0.020740	\$0.015172	
1.b. Origina	ting Carrier Common Line-P	\$0.010000	\$0.000000	
1.c. Origina	ting Carrier Common Line-NP	\$0.005000	\$0.000000	
2. Termina	ating Interim USF Rate	\$0.064851	\$0.022616	
3.a. Local Ex	cchange Rates - RES (avg)		\$16.40	
3.b. Local Ex	cchange Rates - BUS (avg)		\$32.10	
4. Director	ry Revenue Payment Residual			
	GRAND TOTAL			\$0

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Exhibit No. ___HC (TWZ-5HC) also includes the table above populated with the confidential (yellow) and highly confidential (blue) revenue information.

The annual revenue impact estimates above are based on data from the twelve months ended December 31, 2004. However, the Commission should order United to file based on data from the twelve months ended