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July 15, 2002

Ms. Carole Washburn  
Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 South Evergreen Park Dr. S.W.  
Olympia, WA 98504-7250

**Re: Compliance Filing, Eighth Supplemental Order  
Directing GTE Northwest, Inc. to Make Refunds  
Docket No. UT-970658**

Dear Ms. Washburn:

Pursuant to Paragraph 20 of the Eighth Supplemental Order Directing GTE Northwest, Inc. to Make Refunds, in Docket No. UT-970658, Verizon Northwest Inc. submits the original and 19 copies of this letter as its compliance filing. Attached hereto are appropriate work papers that explain Verizon's refund methodology, which comports with Appendix A to the Eighth Supplemental Order. Portions of these work papers are designated as confidential and proprietary, and are submitted pursuant to WAC 480-09-015. The total amount of the refund, including interest through October 15, 2002, totals \$3,322,784. Refunds in the amount of \$1,554,396 have been made for the period of April 15, 1997 through December 31, 1998. The remaining refund amount of \$1,768,388 for the period January 1, 1999 through June 30, 2001 will be refunded as credits to carrier bills, as with the first refund, and should be accomplished by mid October 2002.

Please contact Joan Gage at (425) 261-5238 or Judy Endejan at (206) 340-9694 if you have any questions. Thank you.

Sincerely,

**GRAHAM & DUNN PC**

Judith A. Endejan

JAE/ned

Enclosures

cc: Mary Tenneyson (w/encl.)  
Brooks Harlow (w/encl.)  
Joan Gage (w/encl.)  
Patty Nelson (w/encl.)

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