

October 21, 2003

VIA E-MAIL AND UPS OVERNIGHT

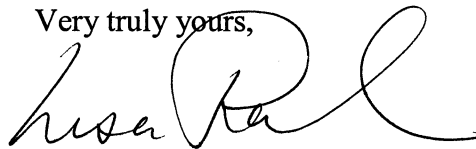
Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
PO Box 47250  
Olympia, WA 98504-7250

Re: Docket No. UT-033025

Dear Ms. Washburn:

Enclosed for filing are the original and six copies of MCI's Comments Regarding Batch Hot Cut Proceedings. A copy was also sent to the Commission electronically. Please contact me with any questions.

Very truly yours,



Lisa F. Rackner

cc: Parties of record

1 **BEFORE THE WASHINGTON**  
2 **UTILITIES AND TRANSPORTATION COMMISSION**  
3

4 In the Matter of:

5 The Implementation of the Federal  
6 Communications Commission's Triennial  
7 Review Order.

Docket No. UT-033025

MCI'S COMMENTS REGARDING BATCH  
HOT CUT PROCEEDINGS

8  
9 Pursuant to the Notice of Opportunity to File Comments issued by the Washington Utilities  
10 and Transportation Commission (the Commission") on October 17, 2003, in the above-referenced  
11 docket, MCI, Inc., on behalf of its subsidiaries operating in the State of Washington, offers the  
12 following comments.

13 The Commission has solicited comments from the parties regarding the batch hot cut  
14 investigation it will be undertaking pursuant to the Federal Communication Commission's Triennial  
15 Review Order ("TRO"). Specifically, the Commission has issued an invitation to the parties to file  
16 comments concerning the obligations of CLECs other than Qwest, and "in particular Verizon  
17 Northwest, Inc., to initiate development of a batch cut migration process within the State of  
18 Washington."

19 MCI points out that Verizon has not filed a petition to initiate a nine-month proceeding under  
20 the TRO and that it has confirmed that, at least for the time being, it will not be seeking a finding of  
21 "no impairment" with respect to mass market switching in its territory. As long as the Commission  
22 has no intention of investigating or issuing a finding of "no impairment" for mass market switching in  
23 Verizon territory in this docket, MCI believes that Commission staff and the parties should not be  
24 burdened with developing a batch hot cut process for Verizon *at this time*.

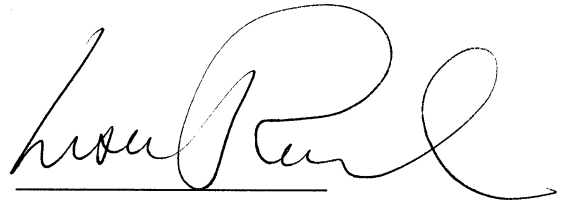
25 MCI believes that at some point in the not-so-distant future, it may wish to transition its  
26 UNE-P customers in Verizon territory to UNE-L. For this reason, MCI reserves the right to petition

1 the Commission to initiate a proceeding to develop a batch hot cut process for Verizon at a later date.  
2 However, MCI believes that, at this time, the parties and Commission staff should be allowed to  
3 concentrate their resources on developing a batch hot cut process for Qwest.

4 DATED this 21<sup>st</sup> day of October, 2003.

5 ATER WYNNE LLP

6  
7  
8 BY:



9 Lisa F. Rackner  
10 Attorney for MCI, Inc.  
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## CERTIFICATE OF SERVICE

UT 033025

I hereby certify that I have this 21st day of October, 2003, served the true and correct original, along with the correct number of copies, of the foregoing document upon the WUTC, via the method(s) noted below, properly addressed as follows:

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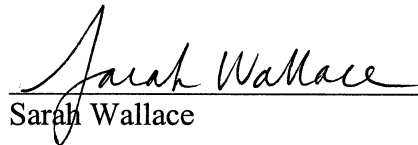
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I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 21st day of October, 2003, at Seattle, Washington.

  
\_\_\_\_\_  
Sarah Wallace