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**VIA FEDERAL EXPRESS AND EMAIL**

David Danner, Executive Director & Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504

***Re: UT-083060 Verizon Northwest Inc. Proposed Wire Center Designation***

Dear Mr. Danner:

Verizon Northwest Inc. ("Verizon") hereby responds (with an original and twelve (12) copies) to the comments submitted by Integra Telecom, its affiliates and 360networks (USA) Inc. (collectively, "Joint CLECs") on December 30, 2008 in the above-referenced docket.

Joint CLECs request that the Commission establish a protective order to allow the opportunity to review Verizon's data supporting its designation of Halls Lake as a tier 2 wire center. Verizon does not object to the issuance of a protective order for that purpose, and is willing to provide confidentially protected data in support of its designation, subject to the limits explained below.

The Joint CLECs request six types of information from Verizon in support of the non-impairment designation: (i) carrier specific loop counts; (ii) an indication of whether or not the carriers identified in (i) are collocated in the Halls Lake wire center; (iii) verification that all line counts represent end-of-year 2007 lines; (iv) a description of adjustments and/or calculations that were made to line counts; (v) the source of line count data; and (vi) any other data that Verizon believes would be useful to review.

As to (i), Verizon is willing to provide carrier-specific loop counts for each entity affiliated with the Joint CLECs for confirmation purposes, but is unable to provide carrier-specific data of other companies. Such information is proprietary to those other companies, and Verizon may not release it to the Joint CLECs. Moreover, the Joint CLECs have no legitimate need for such proprietary information of other carriers because only those other carriers (and not the Joint CLECs) could verify the accuracy of such data in any event.

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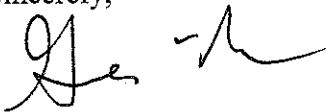
The information sought in request (ii), whether carriers are collocated in the Halls Lake wire center, is irrelevant to a designation of non-impairment based on the number of business lines. The extent of collocation in a wire center, a factor in other types of non-impairment designations that are not at issue here, simply is not a component of the business line calculation. Accordingly, no information on this irrelevant subject (which also would be proprietary to collocating carriers) is needed for validation of non-impairment status for this wire center.

Regarding the verification sought in (iii), Verizon hereby confirms that all of the line counts represent end-of-year 2007 lines without adjustment (and that the line count is fully compliant with the definition of business lines established by the Federal Communications Commission in section 51.5 (Terms and Definitions) of the final rules adopted in the Triennial Review Remand Order. Additionally, the business line count is compliant with ARMIS definitions). In response to the query in (v), the "source[s] of the line count data" used are internal Verizon systems. Verizon does not believe any other data (see request (vi)) would be useful in the review of Joint CLECs.

Verizon trusts that this information is helpful, and will provide the back-up information described above when a protective order is issued in this docket. Verizon respectfully requests that the Commission issue an order accepting the non-impairment designation for the Halls Lake wire center unless the Joint CLECs raise specific objections within thirty (30) days of receiving the information. If the Joint CLECs raise objections, or pose further inquiries, Verizon asks that an expedited schedule be issued so that this matter can be resolved as quickly as possible.

If you have any questions, please give me a call.

Sincerely,



Gregory M. Romano

GMR:pl

cc: Douglas Denney via email ([dkdenney@integratelecom.com](mailto:dkdenney@integratelecom.com))  
Michel L. Singer Nelson via email ([mnelson@360.net](mailto:mnelson@360.net))