

September 26, 2002

VIA FACSIMILE, ELECTRONIC MAIL AND US MAIL

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Post Office Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-003013, Part E

Dear Ms. Washburn:

This is to request an extension of time for parties to file responsive testimony in Part E of this generic cost docket.

Currently, responsive testimony is due October 10, 2002. The Commission entered an order on Monday of this week, September 23, 2002, stating in part:

We agree with Staff's interpretation of paragraph 51. Our Part B directive to file time and motion studies was made with respect to the updated OSS transition costs Qwest and Verizon intended to file in Part E. We do not foreclose the use of actual data in all future proceedings but we will not accept future ILEC-proposed nonrecurring costs simply because they rely on "actual data" or "subject matter expert" testimony.

Paragraph 40 of 38th Supplemental Order, Docket No. UT 003013, Part B.

This Order may reasonably be interpreted to require Qwest and Verizon to file time and motion studies in support of the OSS transition costs that they seek in Part E. Neither Qwest nor Verizon filed time and motion studies in support of its Direct Testimony in Part E.

WorldCom's responsive testimony will vary depending upon whether the Commission requires the incumbent local exchange carriers to supplement their testimony in this

docket with time and motion studies. WorldCom understands that this issue will be discussed at a prehearing conference to be scheduled for October 10, 2002.

It would be unduly burdensome for WorldCom to prepare responsive testimony when uncertainty exists as to the Commission's requirement on this issue. If testimony remains to be due on October 10, WorldCom will need to incur significant expenses to compensate its experts to respond to current direct testimony. Although some evidence may not change, if the Commission requires time and motion studies, it is reasonable to assume that Qwest and Verizon's amended direct testimony will be substantially different. The expenses incurred for October 10 testimony would then substantially be wasted and WorldCom would need to incur additional significant expense to respond to the supplemental testimony.

For these reasons, WorldCom requests an extension of time, until at least October 25, 2002, for all parties to respond to Qwest and Verizon's direct testimony in this docket. If the Commission requires Qwest and Verizon to supplement their current testimony, I presume that an alternative schedule will be set at the prehearing conference.

I have contacted the other parties to this proceeding about this request. Staff counsel has no objection. Qwest and Verizon counsel have no objection to the request as long as a corresponding extension is given to them to file rebuttal testimony and the hearing date is adjusted, as necessary. I have yet to receive responses from the remaining parties.

Thank you for your consideration of this request.

Very truly yours,

Michel L. Singer Nelson

Cc: Parties of Record
Judge Berg