

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Continued Costing and Pricing of Unbundled Network Elements, Transport, Termination, and Resale** )  
 )  
 ) **Docket No. UT-003013**  
 ) **Part D**

**RESPONSE OF VERIZON NORTHWEST INC.  
TO QWEST'S PETITION FOR ADMINISTRATIVE REVIEW  
OF THE 41<sup>ST</sup> SUPPLEMENTAL ORDER, PART D INITIAL ORDER**

Pursuant to WAC 480-09-780(4), Verizon Northwest Inc. ("Verizon") hereby responds in support of Qwest's Petition for Administrative Review of the Forty-First Supplemental Order as it relates to the deadline for compliance tariff filings.

Verizon supports and joins Qwest's request for administrative review and modification of that portion of the Forty-First Supplemental Order that requires Verizon and Qwest to file compliance tariff filings eight business days after entry of the final order. Verizon agrees with Qwest that the eight-business-day time period does not allow enough time to complete such a filing and regularly results in additional administrative burden for the parties and the Commission due to the resulting requests for extension and the expedited review and ruling those requests require. The fifteen-business-day time period recommended by Qwest would generally allow enough time for Verizon to complete an "uncontested" compliance filing that requires neither cost study revisions nor cost narratives. It also would ease the administrative burden on the parties and the Commission. However, like Qwest, Verizon notes that even with a fifteen-business-day time period, extensions may still be necessary for "contested" compliance filings that require cost study revisions and cost narratives. Accordingly, Verizon supports and joins Qwest's recommendation that the Commission modify the required time period for filing compliance tariffs from eight business days to fifteen business days.

Respectfully submitted,

Verizon Northwest Inc.

By  \_\_\_\_\_

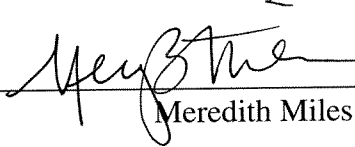
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Dated: November 11, 2002

**CERTIFICATE OF SERVICE**

I hereby certify that an original and 19 copies of the Response of Verizon Northwest Inc. to Qwest's Petition for Administrative Review of the 41<sup>st</sup> Supplemental Order, Part D Initial Order in Part D of UT-003013 were sent by overnight mail and one copy will be sent by electronic mail to Ms. Carole J. Washburn, Executive Secretary, Washington Utilities & Transportation Commission, 1300 S. Evergreen Park Drive SW, Post Office Box 47250, Olympia, WA 98504-7250 and to the parties below by regular and electronic mail:

DATED this 11<sup>th</sup> day of November 2002.

  
\_\_\_\_\_  
Meredith Miles

The Honorable Lawrence Berg  
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