

Docket No. UT-020406

Verizon Northwest Responses to AT&T Data Request Nos. 1-24

August 26, 2002

**AT&T DATA REQUEST NO. 5:** For the most recent 12-month period for which data is available, please provide intrastate toll minutes of use in Washington for each of the following intraLATA toll discount calling plans offered by Verizon: GTE Easy Savings Plan for Business, GTE Easy Savings Plan for Residence, GTE Easy Savings Flat Rate Plan for Business, Sensible Minute for Residence, GTE Business Value Cents, and GTE Residence Value Cents. When measured as part of a particular plan, please provide a breakdown of minutes by Peak/Off-Peak.

**RESPONSE:**

Verizon Northwest objects to this data request, which calls for the production of competitively sensitive information not relevant to the issues in this proceeding.

Prepared by: Judy Endejan - Attorney

August 26, 2002

**AT&T DATA REQUEST NO. 11:** For the most recent 12-month period available, please provide the total retailing, marketing, service order, customer service, and any other "retailing" costs and expenses that Verizon has incurred in the provision of toll service to its end user customers. If Verizon's costs vary by toll calling plan, please provide a breakout of these costs and expenses by toll calling plan.

**RESPONSE:**

Verizon Northwest states that only total regulated booked expenses for "retailing costs" exist. No further product or service breakdown is available, unless a special study is conducted as was done for the Sales, Marketing and Advertising study referenced in the response to AT&T Data Request No. 10. In the ARMIS Joint Cost Report (43-03), accounts 6610, 6611, 6612, 6613 and 6623 provide total regulated expenses for Marketing, Product Management, Sales, Product Advertising and Customer Services, respectively. For 2001, total regulated expenses for these accounts were as follows:

COSA	Account Name	Account	Total Regulated Expenses
GTWA	Marketing	6610	\$18,148
GTWA	Product Management	6611	\$3,963
GTWA	Sales	6612	\$12,326
GTWA	Product Advertising	6613	\$2,130
GTWA	Customer Services	6623	\$33,962
COWA	Marketing	6610	\$1,143
COWA	Product Management	6611	\$285
COWA	Sales	6612	\$744
COWA	Product Advertising	6613	\$115
COWA	Customer Services	6623	\$2,443

Prepared by: Mike Mathews - Manager - Service Costs

Docket No. UT-020406

Verizon Northwest Responses to AT&T Data Request Nos. 1-24

August 26, 2002

**AT&T DATA REQUEST NO. 14:** For each of the last 12 months for which data is available, please provide (a) the total amount in switched access charges that Verizon has collected from each of its affiliates providing toll services in Washington; and (b) the total number of minutes of toll traffic carried by Verizon affiliates that originated on or terminated to Verizon's network.

**RESPONSE:**

Verizon Northwest objects to this data request, which calls for the production of information not relevant to the issues in this proceeding.

Without waiving its objection, Verizon Northwest states that for the last 12 months it has not billed or provided its affiliates intrastate switched access services. Verizon Long Distance, Verizon Enterprise Solutions and Verizon Select Services Inc. provide resold long distance services.

Prepared by: Judy Endejan - Attorney  
Mike Wirl - Senior Product Manager

Docket No. UT-020406

Verizon Northwest Responses to AT&T Data Request Nos. 1-24

August 26, 2002

**AT&T DATA REQUEST NO. 17:** Please provide the most recent total number of local exchange end user customers that Verizon serves in the state of Washington. Of that number, please identify (a) the number who are presubscribed to Verizon's toll services; (b) the number who are presubscribed to intraLATA toll services provided by Verizon affiliates; and (c) the number who are presubscribed to interLATA toll services provided by Verizon affiliates.

**RESPONSE:**

See Verizon Northwest's preliminary objections. In addition, Verizon Northwest objects to this data request, which calls for the production of competitively sensitive information not relevant to the issues in this proceeding.

Prepared by: Judy Endejan - Attorney