



600 University Street, Suite 3600
Seattle, Washington 98101
main 206.624.0900
fax 206.386.7500
www.stoel.com

April 28, 2006

JOHN H. RIDGE
Direct (206) 386-7575
jhridge@stoel.com

VIA LEGAL MESSENGER

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
PO Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504

**Re: Docket No. UT-053025
Verizon Northwest Inc.'s Responses to Bench Request Nos. 5-9**

Dear Ms. Washburn:

Enclosed for filing are the original and eight copies of Verizon Northwest Inc.'s responses to Bench Request Nos. 5-9, including revised responses to WUTC Staff Information Request Nos. 1-4 and the accompanying attachments. Please note that these documents are confidential pursuant to the Protective Order in this matter and WAC 480-07-160.

Please contact me if you have any questions. Thank you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "John H. Ridge".

John H. Ridge

Enclosures

cc: Service list

Oregon
Washington
California
Utah
Idaho

Before the

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UT-053025

VERIZON NORTHWEST INC.

RESPONSES TO BENCH REQUEST NOS. 5 - 9

April 28, 2006

Docket No. UT-053025

Verizon Northwest Inc. Responses to Bench Request Set 2 Nos. 5-9

April 28, 2006

BENCH REQUEST NO. 5:

Please provide sufficient information to allow the Commission and interested persons to determine that Verizon did not alter its ARMIS 43-08 business line data. The additional information must only be provided for the wire centers the Joint CLECS continue to dispute on or before April 28, 2006.

Response:

Verizon has not altered its ARMIS 43-08 business line data for 2003. Please see confidential attachment "WA UTC_Set2_Attach1_5-CONFIDENTIAL" and attachment "WA UTC_Set2_Attach2_5." As shown on this attachment, adding the number of the business lines in Verizon's two non-impaired offices to the total number of business lines in all impaired wire centers in Washington equals the total number of business lines in the state of Washington reported in the ARMIS 43-08 Report.

Prepared By: Darnell Morris

Date: April 27, 2006

Witness: N/A

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Verizon Northwest Inc. Responses to Bench Request Set 2 Nos. 5-9
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BENCH REQUEST NO. 6:

Please provide a clear explanation showing how Verizon separately identifies business and residential UNE-P lines in its ARMIS 43-08 data.

Response:

Verizon separately identifies business and residential UNE-P lines in its ARMIS 43-08 data. Please see attachment "WA UTC_Set2_Attach2_5." As is shown on this attachment, Switched Access lines are reported separately as either business (columns fc, fd, and fe) or residential lines (columns ff, fg, and fh). Because UNE-P/UNE-P replacement lines are included in the Switched Access lines reported on the attached (see footnotes on the attached indicating as much), those lines are broken out separately as business or residential as well.

Prepared By: Darnell Morris
Date: April 27, 2006
Witness: N/A

Docket No. UT-053025

Verizon Northwest Inc. Responses to Bench Request Set 2 Nos. 5-9

April 28, 2006

BENCH REQUEST NO. 7:

(Joint CLECs DR No. 5) For any wire center where Verizon relied on the number of fiber-based collocators to determine the wire center nonimpairment classification, please provide all data demonstrating that as of March 11, 2005, each collocator (a) was a fiber-based collocator as of March 11, 2005, and (b) connects its collocated equipment directly to its own fiber-optic network without relying on Verizon UNEs or cross-connects to other collocated carriers.

Response:

In order to assess whether a collocation arrangement is fiber-based, Verizon used the results from physical inspections performed in the summer of 2003 for the purpose of creating potential state Triennial Review filings. The 2003 results were updated to remove any Collocation arrangements that had been terminated between the time of the physical inspections and January 31, 2005. The data was aggregated on a CLEC Affiliate Family basis, so that if multiple CLECs of the same CLEC parent were in a wire center, the CLEC Affiliate Family was only counted as a single collocation. In addition, any CLECs that had gone out of business, but not reflected as being terminated, were removed from the count. See the attached confidential file "WA UTC_Set2_Attach1_7-CONFIDENTIAL" for Verizon's Proprietary Methods and Procedures that were used for the inspection process. The procedure makes clear that the inspection process complied with TRRO requirements. Also, see attached confidential file "WA UTC_Set2_Attach2_7-CONFIDENTIAL", which is the Verizon proprietary inspection spreadsheet for the Redmond central office inspection. The Redmond central office is the only Verizon wire center in Washington that is non-impaired based on the number of fiber-based collocators.

Prepared By: Robert Graves

Date: April 25, 2006

Witness: N/A

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Verizon Northwest Inc. Responses to Bench Request Set 2 Nos. 5-9

April 28, 2006

BENCH REQUEST NO. 8:

(Joint CLECs DR No. 6) For any wire centers where Qwest has identified Verizon as a fiber based collocator, please confirm that Verizon meets the TRRO definition of fiber based collocator in those Qwest offices as of December 2003, March 2005 and July 2005. Please provide this data for both the traditional Verizon collocations and the collocations Verizon obtained in its purchase of MCI.

Response:

Yes, Verizon meets the TRRO definition of fiber based collocator in offices identified by Qwest as of December 2003, March 2005 and July 2005.

Prepared By: Buff Hopper / Lynelle Reney

Date: April 25, 2006

Witness: N/A

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Verizon Northwest Inc. Responses to Bench Request Set 2 Nos. 5-9
April 28, 2006

BENCH REQUEST NO. 9:

Please resubmit the information in response to Order 02, as confidential, masking the data as appropriate and providing the individual CLECs with their own masking code.

Response:

See attached.

Prepared By: Kim Douglass
Date: April 24, 2006
Witness: N/A

**Washington UTC UT-053025
Set 2 DR #5
ARMIS 43-08 Business Line Data as of December, 2003**

CLLI-8 digit	Wire Center Name	Business Access Lines ¹	Loop & EEL Lines ²	Total Lines
BOTHWAXB	BOTHELL			
RDMDWAXA	REDMOND			
Impaired WireCenters	All Other			
Total	WA State			

¹ Total Business Switched Access Lines reported within Columns (fc)-(fe) of Table III of Report 43-08. See attachment WA UTC_Set2_Attach2_5 for the state of Washington's portion of Verizon Northwest, Inc. ARMIS 43-08 Report.
² UNE Loops and EEL Loops as provided in 47 C.F.R. § 51.5 of the FCC's Rules.

Triennial Review Response Inspection Process Steps
Fiber Based Collocation & CATT Connection

REDACTED

REDACTED

REDACTED

REDACTED

CO State	CO LATA	App Type	Arrangement Billing Status Mar03	Colo to CATT config	Site est Pre 1/1/98	Orig App indicated GLEC was to pull fiber	ONE database finding GLEC has at least one arrangement pulling fiber	GO CILLI 8digit	GLECNm	ACNA	Inspector Name
WA	674										
WA	674										
WA	674										
WA	674										
WA	674										
WA	674										



Inspector Contact #	Inspector's Org Director Name	Date of Physical Inspection	Inspected collocation arrangement appears to be Operational (Yes/No)	IF OLEC Fiber Based Collocation Inspector Confirms that Fiber is Placed to the Collocators Arrangement and is Leaving the CO (Yes/No)	IF Fiber extends Colloc to GATT Inspector Confirms that Fiber is Placed to the Collocators Arrangement and also enters a GATT shelf/endo safe (Yes/No)	Inspection Notes Regarding Physical Inspection

Before the

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Docket No. UT-053025

VERIZON NORTHWEST INC.

RESPONSES TO WUTC STAFF INFORMATION REQUEST NOS. 1-4

REVISED

APRIL 28, 2006

Docket No. UT-053025

Verizon Northwest Inc. Responses to WUTC Staff Information Request Set 1 Nos. 1-4

REVISED

April 28, 2006

INFORMATION REQUEST NO. 1:

Please provide a list of wire centers in the Company's service territory in Washington that will be designated as "non-impaired" pursuant to the final rule in Appendix B of the FCC's Triennial Review Remand Order (TRRO) and specifically identify each wire center on the list for DS1 and DS3 Loops, and DS1, DS3 and Dark Fiber transport.

Response:

Please see Attachment "WA UTC_Set1_Attach1_1".

Prepared By: Thomas Bausch

Date: 02/24/06

Witness: N/A

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Verizon Northwest Inc. Responses to WUTC Staff Information Request Set 1 Nos. 1-4

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INFORMATION REQUEST NO. 2:

Please identify for each wire center whether it is classified as a tier 1 or tier 2 wire center, and whether the calculation is based on the number of fiber-based collocators (include the names of the collocators), or the number of business lines (line counts by each carrier) or both.

Response:

Please see Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".

Prepared By: Thomas Bausch / Darnell Morris

Date: 02/24/06

Witness: N/A

INFORMATION REQUEST NO. 3:

For each of the wire centers listed as “non-impaired”, please provide a descriptive explanation and data necessary for the Commission and other participants to validate. The underlying data, at minimum, should include the following:

- (i) The total number of fiber-based collocators as defined in 47 C.F.R. § 51.5.
- (ii) The date on which the number of fiber-based collocators was determined.
- (iii) The name of each fiber-based collocator.
- (iv) If the ILEC requested affirmation from a carrier regarding whether or not the carrier, if included in part (iii) above, was a fiber-based collocator, please provide documents to support whether the carrier affirmed, denied or did not respond to the ILEC’s request.
- (v) The total number of business lines as defined in 47 C.F.R. § 51.5.
- (vi) The date on which the business line counts data was calculated. Note: If different components of the business line counts come from sources representing different points in time, then each component should be identified and the corresponding date for each component provided.
- (vii) Total ILEC business switched access lines.
- (viii) If the methodology used to determine the line counts in (vii) above differ from the methodology used to determine switched business line counts for ARMIS 43-08, describe the differences and any data that would allow the Commission or participants to reconcile this data.
- (ix) Total UNE Loops for each CLEC.
- (x) Number of UNE Loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement).
- (xi) Number of UNE Loops, for each CLEC, where the ILEC does not provide switching.
- (xii) If different from (x) above, the number of business loops, for each CLEC, provided in combination with ILEC switching (e.g. UNE-P, QPP, or other ILEC Commercial arrangement). If this information is not available, indicate whether the response to (x) includes both business and residential loops.
- (xiii) If different from (xi) above, the number of switched business loops, for each CLEC, where the ILEC does not provide switching. If this information is not available, indicate whether the response to (xi) includes both business and residential loops, switched and non-switched loops.

- (xiv) If the total of UNE Loops in (x) and (xi) above does not equal (ix) above, explain the difference, including any data that would allow participants to reconcile this data.
- (xv) Provide all underlying data, calculations and any description used to count digital access lines on a 64-kbps-equivalent basis for the counts in (vii) and (xi) above.
- (xvi) Verify that line counts associated with remote switch locations are associated with the remote and not the host switch. If this is not the case, explain why not.

Response:

- (i) Please see response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (ii) March 11, 2005 was the effective date of Verizon's data, however, the physical inspections performed to determine the number of fiber based collocators were performed prior to this date.
- (iii) Please see response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (iv) Verizon did not specifically request affirmation from each carrier regarding whether or not the carrier was a fiber-based collocator. However, Verizon, in its March 1, 2005 correspondence that provided the wire center list to the CLEC industry notified the CLECs how to obtain appropriate backup data and specifically requested that CLECs contact Verizon should they have verifiable data that demonstrated that either wire center should not be identified as nonimpaired.
- (v) Please see response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (vi) All components of the business line counts were determined as of December 31, 2003. Please see response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (vii) Please see response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (viii) The methodology used to determine the line counts in (vii) is the same as the methodology used to determine switched business line counts for ARMIS 43-08. Please see response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (ix) Please see Confidential Attachment "WA UTC_Set1_Attach1_3 ix-CONFIDENTIAL CODED".
- (x) Verizon did not consider the number of UNE Loops, for each CLEC, provided in combination with ILEC switching for purposes of counting UNE loops in assessing non-impairment status. Loops provided in combination with ILEC switching (e.g. commercial arrangements) are not included in total UNE Loops

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provided in Part (ix) but rather are included in the business switched access lines provided in ARMIS 43-08.

- (xi) Please see response to IR 3(ix) and Confidential Attachment "WA UTC_Set1_Attach1_3 ix-CONFIDENTIAL CODED".
- (xii) Please see response to IR 3(x) and also response to IR 2 and Confidential Attachment "WA UTC_Set1_Attach1_2-CONFIDENTIAL".
- (xiii) Please see response to IR 3(x) and also Confidential Attachment "WA UTC_Set1_Attach1_3 xiii-CONFIDENTIAL CODED".
- (xiv) Because of the methodology explained in (x) above, the total of UNE Loops in (x) and (xi) above equal the loops reported for (ix). Therefore, no reconciliation is needed.
- (xv) All lines are counted on a DS0 or voice grade equivalency basis. All business lines and UNE loops have a VGE conversion factor of 1, with the following exceptions:
 - ISDN BRI is counted as 2,
 - ISDN PRI as 23,
 - DS1 as 24,
 - DS3 as 672
- (xvi) The line counts for the Bothell central office (the only Verizon office in Washington reaching non-impairment status based on the number of business lines) include lines associated with certain remote switch locations that share NPA-NXX codes with the Bothell host switch. Lines from these remote switch locations were included with the Bothell office in the billing data supporting the ARMIS 43-08 access line reports that were used to identify line counts.

Prepared By: (i)-(iii); (xv) -- Thomas Bausch; (iv) -- Robert Graves; (v)-(xiv) -- Darnell Morris; (xvi) -- Steve Collins

Date: 02/24/06

Witness: N/A

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Verizon Northwest Inc. Responses to WUTC Staff Information Request Set 1 Nos. 1-4

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INFORMATION REQUEST NO. 4:

If the calculation of number of lines (or inclusion of certain lines) is based on a directive from the FCC as Qwest has indicated during the workshop, please provide the detailed citations of the FCC's decision(s).

Response:

Verizon's calculations were based upon the FCC's TRRO, Appendix B – Final Rules, § 51.5 (terms and definitions of a business line).

Prepared By: Robert Graves

Date: 02/24/06

Witness: N/A

Washington UTC UT-053025
Information Request 1

Non-Impaired Wire Centers	Status	UNE Relief From Transport:			UNE Loop Relief:	
		DS1	DS3	Dark Fiber	DS1	DS3
BOTHWAXB	Tier 2	No	Yes	Yes	No	No
RDMDWAXA	Tier 1	Yes ¹	Yes	Yes	No	No

Note 1 -- Although this wire center has qualified for DS1 transport relief, because there are no other tier 1 offices, effectively Verizon does not have UNE DS1 transport relief in the state of Washington.

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Information Request 2

Wire Center	Transport Status	Classification Basis	Business Access Lines	Loop & EEL Lines ¹	Total Lines	Fiber Collo Providers
BOTHWAXB	Tier 2					
RDMDWAXA	Tier 1					
Wire Center	Fiber Based Collo Provider					
BOTHWAXB						
RDMDWAXA						

Note 1 -- Please see response 3(ix) for loops and EELs by carrier.

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Current CLEC Name	Code
	