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September 8, 2005

VERONICA MOORE Direct (206) 386-7519 vmoore@stoel.com

VIA E-MAIL AND FEDERAL EXPRESS

Ms. Carole Washburn, Executive Secretary Washington Utilities & Transportation Committee 1300 Evergreen Park Drive, SW Olympia, WA 98504

Re: Docket No. UT-041127

Dear Ms. Washburn:

Please find enclosed an original and seven copies of Verizon's Motion to Defer Ruling on Petition For Reconsideration and a Certificate of Service.

Please contact us if you have any questions, and thank you in advance for your assistance.

Very truly yours,

Veronica Moore

Assistant to Timothy J. O'Connell

Enclosures

cc:

ALJ Ann Rendahl Parties of Record

> Oregon Washington California Utah

1 daho

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of) DOCKET NO. UT-041127
THE JOINT PETITION FOR)
ENFORCEMENT OF INTERCONNECTION) MOTION TO DEFER RULING
AGREEMENTS WITH VERIZON) ON PETITION FOR
NORTHWEST INC.) FOR RECONSIDERATION

- 1. Currently pending before the Commission in this matter is the Petition of Respondent Verizon Northwest Inc. for Reconsideration of Order No. 3 ("Reconsideration Petition"). Petitioners and Intervenor have answered the Reconsideration Petition. By this Motion, Verizon requests that the Commission further extend the time for action on that Petition.
- 2. While the Reconsideration Petition has been pending before the Commission, Verizon has separately negotiated with other parties seeking a potential mutually-agreeable resolution of the issues raised by this proceeding. Those discussions have borne fruit; Verizon anticipates that petitioner AT&T will shortly file a motion to withdraw from this proceeding. Negotiations with other parties continue in the context of broader negotiations for commercial agreements, but a decision by the Commission on the Reconsideration Petition one way or the other, could complicate those discussions. Those discussions are already complex, dealing with multiple parties and difficult issues.
- 3. No party will be prejudiced by this deferral, because Verizon continues to provide the Petitioners access to the Mount Vernon Switch under the terms of the Commission's previous orders.

Wherefore, Verizon requests that the Commission defer ruling on the Reconsideration 4. Petition until no earlier than March 26, 2006.

Dated this 344 day of September, 2005 at Seattle, Washington.

Respectfully submitted,

Timothy J. O'Connell John H. Ridge

STOEL RÎVES LLP

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Counsel for Verizon Northwest Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this 8th day of September, 2005, served the true and correct original, along with the correct number of copies, of *Motion to Defer Ruling on Petition For Reconsideration* and a *Certificate of Service* upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn, Executive Secretary
Washington Utilities & Transportation
Commission

1300 S. Evergreen Park Drive SW
Olympia, WA 98503-7250

Hand Delivered
U.S. Mail (1st class, postage prepaid)

Vernight Mail
Facsimile (360) 586-1150

Email (records@wutc.wa.gov)

I hereby certify that I have this 8th day of September, 2005, served a true and correct copy of the foregoing documents upon parties noted below via E-Mail and U.S. Mail:

MICHAEL E. DAUGHTRY United Communications, Inc., d/b/a UNICO 389 SW Scalehouse Court Bend, OR 97702

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CERTIFICATE OF SERVICE - 1

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Denver, CO 80202
Email: michel.singer_nelson@mci.com

I hereby certify that I have this 8th day of September, 2005, served a true and correct copy of the foregoing documents upon parties noted below via U.S. Mail:

MCIMETRO TRANSMISSION ACCESS CORP.
707 17th St., Suite 3600
MCI Tower
Denver, CO 80202

AT&T COMMUNICATIONS OF THE PACIFIC NORTH 2120 Caton Way S.W., Suite B Olympia, WA 98502

I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

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DATED this 8th day of September, 2005, at Seattle, Washington

Veronica Moore