

1
2 BEFORE THE
3 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

4 In the Matter of the Petition of) Docket No. UT- 061926
5)
6 VERIZON NORTHWEST INC.)
7) JOINT MOTION FOR STAY OF
8 For Waiver of WAC 480-120-071) PROCEEDING
9)
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12 Verizon Northwest Inc. ("Verizon") and the Commission Staff ("Staff")
13 (collectively, "the Parties") file this joint motion to stay this proceeding until the
14 Commission completes its consideration of potential revisions to its current extension of
15 service rules in Docket No. UT-073014.

16 AS GROUNDS for this joint motion, the Parties state:

17 1. On March 29, 2007, the Commission opened a rulemaking proceeding, Docket
18 No. UT-073014, to consider possible revisions to its extension of service rules found in WAC
19 480-120 and WAC 480-123.

20 2. Verizon has filed several petitions for waivers from WAC 480-120-071(2)(b).
21 Two of Verizon's waiver petitions have recently been the subject of a Settlement Agreement
22 between the Parties in consolidated dockets UT-061298 and UT-061464. That Settlement
23 Agreement is filed in those consolidated dockets contemporaneously with this joint motion.

24 3. In that Settlement Agreement, the parties agreed to file this Joint Motion for Stay
25 of Proceeding in this docket until the Commission issues a final order in Docket UT-073014.

26 4. The Settlement Agreement also provides that if the Commission does not approve
27 this joint motion, either Party may withdraw from the Settlement Agreement in consolidated
28 dockets UT-061298 and UT-061464.

1 5. The waiver process set forth in WAC 480-120-071(7) recognizes that certain
2 requested line extensions pose unreasonable costs and burdens on carriers and on Washington
3 ratepayers, and thus should not be undertaken or should be paid for by the applicant.

4 6. Under WAC 480-120-071(7)(a), the Commission may – although it is not
5 required to – rely on the factors set forth in WAC 480-120-071(b)(ii) and any other information
6 it considers necessary to analyze whether an applicant is reasonably entitled to service. Under
7 WAC 480-120-071(7)(b), the Commission will consider the factors set forth in WAC 480-120-
8 071(b)(ii) to determine whether it is reasonable for the carrier to charge the applicant the direct
9 cost to extend service.

10 7. Waiver may be appropriate when the costs and burdens associated with serving an
11 applicant at the expense of other ratepayers results in an unreasonable allocation of resources.

12 8. This waiver proceeding relates to an extension of service under the Commission’s
13 extension of service rules.

14 9. In response to concerns raised by stakeholders about the appropriateness of the
15 line extension rule’s requirements, the Commission has opened a rulemaking proceeding (Docket
16 UT-073014) to address these concerns.

17 10. It is anticipated that the Commission will provide more guidance as to the
18 circumstances under which telecommunications carriers must extend telephone service to
19 potential customers, particularly in remote areas of Washington.

20 11. A stay would resolve potential ex parte conflicts posed by pending litigation
21 involving many of the same issues as the line extension rulemaking and necessarily many of the
22 same Commission Staff members.

1 12. Furthermore, the Commission's and the Parties' resources will be more effectively
2 utilized by focusing on the rulemaking, rather than trying to simultaneously litigate waiver
3 requests that raise the same policy issues.

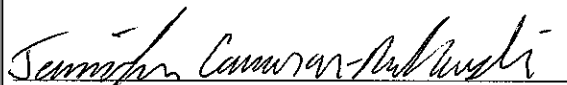
4 13. For the reasons stated, the Parties respectfully request that the Commission grant
5 this Joint Motion for Stay of Proceeding until the Commission issues a final order in Docket UT-
6 073014.


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8 Respectfully submitted this 6th day of July, 2007.

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

VERIZON NORTHWEST INC.

ROBERT M. MCKENNA
Attorney General


JENNIFER CAMERON-RULKOWSKI
Assistant Attorney General
Counsel for the Utilities and
Transportation Commission


THOMAS F. DIXON
Counsel for Verizon Northwest Inc.

Dated: July 6, 2007.

Dated: July 5, 2007.