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July 6, 2004

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VIA HAND DELIVERY

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

Re: Docket No. UT-043013 –

Dear Ms. Washburn:

Enclosed please find an original and six copies for filing a Motion for Further Extension of Time with its Certificate of Service.

If you have any questions or concerns, please do not hesitate to call.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy J. O'Connell".

Timothy J. O'Connell

Enclosures

cc: Parties of Record

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06 JUL -6 PM 3:02
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CLERK OF THE COURT

Oregon
Washington
California
Utah
Idaho

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for
Arbitration of an Amendment for
Interconnection Agreements of

VERIZON NORTHWEST INC.

with

COMPETITIVE LOCAL EXCHANGE
CARRIERS AND COMMERCIAL
MOBILE RADIO SERVICE
PROVIDERS IN WASHINGTON

Pursuant to 47 U.S.C. Section 252(b),
And the *Triennial Review Order*

Docket No. UT-043013

MOTION FOR FURTHER EXTENSION
OF TIME

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CLERK OF THE COMMISSION

1. Verizon Northwest Inc. ("Verizon") respectfully moves for a further extension of time for the parties to submit the completed issues list required by the Commission's Order No. 6 of June 18, 2004. Verizon represents that it is authorized to state that Competitive Carrier Coalition,¹ the Competitive Carrier Group,² MCI and AT&T have consented to this Motion. In support of this Motion, Verizon respectfully states as follows:

2. On June 16, 2004, the D.C. Circuit's mandate issued in *United States Telecom Association v. FCC*, 359 F.3d 554 (D.C. Cir. 2004). With the issuance of the D.C. Circuit's

¹Focal Communications Corporation of Washington, ICG Telecom Group, Inc., Integra Telecom of Washington, Inc., McLeod USA Telecommunications Services, Inc., and Pac-West Telecomm, Inc.

²Advanced TelCom Group, Inc., BullsEye Telecom Inc., Comcast Phone of Washington LLC, DIECA Communications, Inc. d/b/a Covad Communications Company, Global Crossing Local Services, Inc., and Winstar Communications LLC.

mandate, Verizon will be able to simplify substantially its proposed *Triennial Review Order* amendment. Verizon anticipates filing a shorter, revised amendment with the Commission within the next few weeks. Verizon anticipates that the arbitration could then proceed on the basis of that shorter, revised amendment, reducing the burden on the parties and on the Commission.

3. Counsel for Verizon accordingly has conferred with Philip Macres, counsel for the Competitive Carrier Coalition; Letty Friesen, counsel for AT&T; Michel Singer-Nelson, counsel for MCI; and Heather Hendrickson, counsel for Competitive Carrier Group. These CLEC parties do not oppose Verizon's request for additional time, with the clarification that CLECs will desire additional time for negotiation, development of an issues list, and submission of briefs after the filing of the revised amendment.³ Once Verizon files the revised amendment, Verizon will confer with the CLECs and submit a further motion asking the Commission to establish a date certain for filing an issues list or other appropriate filing(s).

4. Verizon has also conferred with other parties. XO Time Warner Telecom and Sprint may oppose this motion.

WHEREFORE, Verizon respectfully moves for an extension of time for the parties to

³ CLECs have informed Verizon that they reserve all rights, including any procedural or substantive objections they may have, with respect to Verizon's forthcoming proposal since they have not seen it.

submit the completed issues list required by the Commission's Order No. 6 until an appropriate time after submission of Verizon's revised proposed amendment.

Respectfully submitted,



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