

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Investigation)	
Concerning the Status of Competition and)	DOCKET NO. UT-053025
Impact of the FCC's Triennial Review)	
Remand Order on the Competitive)	VERIZON RESPONSE TO
Telecommunications Environment in)	JOINT CLEC COMMENTS ON WIRE
Washington State.)	CENTER DESIGNATIONS
)	
)	
)	

1. Verizon Northwest Inc. ("Verizon") responds to the Joint CLEC Comments on Wire Center Designations (the "Joint CLEC Comments") submitted on or about May 5, 2006 by Covad Communications Company, Eschelon Telecom of Washington, Inc., Integra Telecom of Washington, Inc., McLeodUSA Telecommunications Services, Inc., and XO Communications Services, Inc. (collectively "Joint CLECs").

2. As to Verizon, the Joint CLECs Comments challenge only the Tier I status of Verizon's Redmond wire center, raising questions about the number of fiber-based collocators in that wire center. The Joint CLECs concerns are without basis; at all relevant times there have been at least four fiber-based collocators in Verizon's Redmond wire center.

3. The question raised in the Joint CLECs Comments caused Verizon to re-inspect the Redmond wire center. On May 12, 2006 Verizon personnel physically reviewed the collocation arrangements in that wire center. The Joint CLECs are correct in one regard: is indeed not a fiber-based collocator as defined in the *TRRO*. That does not, however, resolve the issue.


4. Excluding this CLEC, which Verizon initially identified, four fiber-based collocators exist in the Redmond wire center: [REDACTED]

[REDACTED] A fifth CLEC, [REDACTED] had not been included in Verizon's original count because, at the time that inspection was undertaken in 2003, this CLEC had placed an order with Verizon to terminate that arrangement. Out of an excess of caution, Verizon did not include in its original count any collocator that had a pending order for the termination of that arrangement. Given the arrangement continues to exist, it should be included as a fiber-based collocator.

5. Thus, at all relevant times, up to the present, Verizon's Redmond wire center has been occupied by at least four fiber-based collocators. It fully satisfies the requirements for Tier I status.

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