

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for Arbitration
of an Amendment to 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

CCG RESPONSE TO VERIZON'S
PROPOSED PROCEDURAL
SCHEDULE

1 Advanced TelCom, Inc. (f/k/a Advanced Telecom Group Inc.); BullsEye Telecom Inc.; Comcast Phone of Washington LLC; and Covad Communications Company (collectively, "Competitive Carriers Group") hereby respectfully submits its response to Verizon Northwest Inc.'s ("Verizon's") proposed procedural schedule in accordance with the Washington Utilities and Transportation Commission's ("Commission's") August 31, 2004 Notice.¹

2 The CCG does not oppose Verizon's proposed procedural schedule in concept. That is, the CCG agrees that the parties should be given a certain timeframe to negotiate Verizon's revised TRO amendment, submit an issues matrix and that the resulting issues should be resolved through the filing of initial and reply briefs. The CCG, however, believes that a procedural schedule for this proceeding should not be established until Verizon actually files its revised TRO amendment and the parties are afforded an opportunity to review the amendment and determine the necessary negotiation timeframe. Although the CCG does not

¹ Notice of Opportunity to Respond to Verizon's Proposed Procedural Schedule, Docket No. UT-043023 (Aug. 31, 2004) ("Notice").

disagree, at this point, that thirty days may be sufficient time, the CCG opposes committing to a firm schedule until provided time to review Verizon's revised TRO amendment.

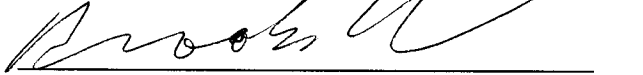
3 Furthermore, the CCG opposes Verizon's attempt to use the Commission's direction in Order No. 8 to dismiss parties from this proceeding.² Verizon has incorporated its desire to file notices of dismissal into its proposed procedural schedule. Such action is beyond the scope of the Commission's direction in Order No. 8. Specifically, the Commission, in the context of determining whether the Status Quo Order No. 5³ applies to all carriers in this proceeding, directed Verizon to file copies of those interconnection agreements in which Verizon argues that there is no applicable dispute resolution process and that Verizon may act unilaterally to terminate certain UNEs. Verizon has now declared that the filing of these agreements should not only result in denying certain carriers protection under the Commission's Status Quo Order, but additionally dismissing them from the proceeding entirely. This Commission should not allow Verizon to unilaterally restrict the scope of this arbitration, to the detriment of a vast number of Washington telecommunications companies. Although the CCG submits that the Commission should not entertain Verizon's identification of carriers Verizon believes should be dismissed from the proceeding, to the extent the Commission does allow Verizon to make such identification, the CCG requests that it be given an opportunity to respond.

² Order Granting Interlocutory Review of Order No. 05, Denying in Part Verizon's Petition for Review, Requiring Verizon to File Copies of Individual Interconnection Agreements, Docket No. UT-043013 (Aug. 13, 2004).

³ Order Denying Motions to Dismiss, Granting Joint CLECs' Motion, Requiring Verizon to Maintain Status Quo, Docket No. UT-043013 (June 15, 2004).

Respectfully submitted this 3rd day of September, 2004.

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