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July 15, 2014

Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

RE: *In the Matter of the Joint Application of Verizon Communications, Inc. and Frontier Communications Corporation for an Order Declining to Assert Jurisdiction Over or, in the Alternative, Approving the Indirect Transfer of Verizon Northwest Inc.*
Docket UT-090842

Dear Mr. King:

Enclosed for filing in the above-referenced docket are the original and seven copies of Staff's Response to Frontier's Petition to Amend Order 06, and Certificate of Service.

Sincerely,

JENNIFER CAMERON-RULKOWSKI
Assistant Attorney General

JCR/emd
Enclosure
cc: Parties



BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Application of

VERIZON COMMUNICATIONS INC.
AND FRONTIER COMMUNICATIONS
CORPORATION

For an Order Declining to Assert
Jurisdiction Over, or, in the Alternative,
Approving the Indirect Transfer of Control
of Verizon Northwest Inc.

DOCKET UT-090842

COMMISSION STAFF'S
RESPONSE TO FRONTIER'S
PETITION TO AMEND ORDER 06

1 Staff does not oppose amending Order 06 in Docket UT-090842 (Acquisition Order) to remove the requirement that Frontier file an earnings review. In addition, Staff does not object to discontinuing the requirements set forth in the Acquisition Order that Frontier file switch replacement and capital expenditures reports.

2 Staff believes that granting the requests is consistent with the Commission's more recent decision in Docket UT-121994 regarding competitive classification of Frontier's retail services (Order 06, served July 22, 2013). In this decision, the Commission found that Frontier's basic residential and small business local exchange services are subject to effective competition and classified most of the company's retail services as competitive.

Dated this 15th day of July, 2014.

Respectfully submitted,

ROBERT W. FERGUSON
Attorney General



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

CERTIFICATE OF SERVICE
Docket UT-090842

I hereby certify that I have this day served Staff's Response to Frontier's Petition to Amend Order 06 on the persons and entities listed on the Service List below by depositing a copy of said document in the United States mail, addressed as shown on said Service List, with first class postage prepaid.

DATED at Olympia, Washington this 15th day of July, 2014.



ELIZABETH M. DeMARCO

Receive *Highly Confidential* Version:

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