



Christine O. Gregoire

ATTORNEY GENERAL OF WASHINGTON

900 Fourth Avenue #2000 • Seattle WA 98164-1012

August 6, 2004

VIA ABC LEGAL MESSENGER

Carole Washburn
WUTC
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

RE: WUTC v. Verizon
Docket No: UT-040788

RECEIVED
94 AUG - 6 PM 2:20
OFFICE OF THE ATTORNEY GENERAL
WASHINGTON STATE

Dear Ms. Washburn:

In accordance with the directions provided by Judge Wallis this morning please find attached to this letter sixteen copies of a cross examination exhibit in sealed envelopes as well as redacted copies of the exhibit. The exhibit is one for which the company has asserted a right to confidential designation of the redacted information.

Please note that according to WAC 480-07-160(1)(b) Public Counsel is not the provider of the information designated as confidential. It is Public Counsel's belief that Verizon is the "provider" according to WAC 480-07-160(1)(b). Public Counsel makes no assertion regarding the propriety of the assertion of confidentiality by the company in accordance with WAC 480-07-160(2). Public Counsel affirmatively reserves all rights under WAC 480-07-160(4) to challenge the designation of confidentiality asserted by the provider with regard to the information designated as confidential by the provider.

As discussed this morning with WUTC Records Center personnel we ask that this exhibit and the redacted version be added to the original for filing and substituted into the 15 packets as a replacement for the document removed this morning at their request.

Sincerely,

Simon J. Ffitch
Assistant Attorney General
Public Counsel

SJf:cjw
Enclosures

cc: Service List (First Class Mail)



Data Request No. PC-6

Does Verizon NW market and sell DSL and associated Internet services to its Washington subscribers?

- a. If yes, identify the revenues from these services and state whether they are included in the calculation of revenue deficiencies presented in this case.
- b. If no, identify any affiliated entities that do market these services.
- c. If no, identify the rates and charges that Verizon receives from the providers of such services.
- d. If no, identify the total amount of revenue from the rates and charges for these services during 2003 and state whether such revenues were included in the calculation of the revenue deficiencies in this case.
- e. If no, and if affiliated entities do market these services, state the net income of these entities during the year ended September 30, 2003.

RESPONSE:

No, Verizon Northwest does not market and sell DSL and associated Internet services to its Washington subscribers.

- a. Not applicable.
- b. GTE.NET LLC d/b/a Verizon Internet Solutions a/k/a Verizon OnLine is the Verizon affiliate that markets these services to Washington subscribers.
- c. See Attachment PC-6 for an excerpt from Verizon's F.C.C No. 20 Tariff, which gives the rates for Verizon's Tariffed DSL services.
- d. Total interstate revenues of \$3,299,084 were recorded by Verizon Northwest - Washington in connection with FCC-tariffed DSL loop services. All of these revenues are determined to be interstate in nature, therefore, were not included in the calculation of the revenue deficiencies in this case.

Docket No. UT-040788
Public Counsel Data Requests to Verizon No. 1-14
June 4, 2004

- e. Verizon NW objects to this request because the information requested is not relevant to the issues in this case to the extent it requests information from Verizon NW affiliates that goes beyond that reported to the Commission on Verizon NW annual Affiliate Interest Reports. Without waiver of the foregoing objection, Verizon NW's 2003 Affiliate Interest Report shows that GTE.NET LLC recognized a net [REDACTED] (CONFIDENTIAL) for year ended 2003.

Prepared By: Judy Geise (a,b,e), Russell Overby (c), Jane Lee (d), Judy Endejan (e)

Date: June 1, 2004

Witness: Nancy Heuring or another SME to be identified at a later date.

(Confidential per Protective Order in WUTC Docket No. UT-040788)

CONFIDENTIAL

Verizon Response to Public Counsel Data Request No. PC-6
UT-040788

Attachment PC-6

THE VERIZON TELEPHONE COMPANIES

Tariff F.C.C. No. 20
1st Revised Page 5-700
Cancels Original Page 5-700

COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)

PART III (Continued)

5.1 Verizon Infospeed DSL Solutions (Continued)5.1.6 Rates and Charges

A. Month-to-Month Plan*

	<u>Monthly Rate</u>
Verizon Infospeed 768K/128K	\$ 39.95
Verizon Infospeed 1.5M/128K	43.95
Verizon Infospeed 1.5M/384K	43.95 (R)
Verizon Infospeed 7.1M/768K	109.95
Verizon Infospeed 384K/384K	46.00
Verizon Infospeed 768K/768K	80.00

B. One-Year Term Plan*

Schedule I - Applicable to Customers that subscribe to the One-Year Term Plan on or before August 31, 2001.

Verizon Infospeed 768K/128K	\$ 32.50
Verizon Infospeed 1.5M/128K	36.50
Verizon Infospeed 1.5M/384K	41.50
Verizon Infospeed 7.1M/768K	102.95
Verizon Infospeed 384K/384K	39.00
Verizon Infospeed 768K/768K	68.00

Schedule II - Applicable to Customers that subscribe to the One-Year Term Plan on or after September 1, 2001.

Verizon Infospeed 768K/128K	\$ 37.50
Verizon Infospeed 1.5M/128K	41.50
Verizon Infospeed 1.5M/384K	41.50 (R)
Verizon Infospeed 7.1M/768K	102.95
Verizon Infospeed 384K/384K	44.00
Verizon Infospeed 768K/768K	68.00

* Wholesale rates are also available to eligible Telecommunications Carriers pursuant to §251(c)(4) of the Telecommunications Act of 1996.

(Issued under Transmittal No. 429)

Issued: April 12, 2004

Effective: April 27, 2004

Vice President, Federal Regulatory
1300 I Street, NW, Washington, D.C. 20005

(T)

THE VERIZON TELEPHONE COMPANIES

Tariff F.C.C. No. 20
 2nd Revised Page 5-718.8
 Cancels 1st Revised Page 5-718.8

 COMMUNICATIONS SERVICES TARIFF

SECTION 5 - DESCRIPTION OF DATA SERVICES AND RATES (Continued)

PART III (Continued)

5.3 Verizon Infospeed DSL Solutions Five-Year Term and Volume Discount Plan
(Continued)5.3.7 Rates and Charges

A. Monthly Rates

CL	SY1	SY2	SY3	SY4	SY5	Verizon	Verizon	Verizon	
						Infospeed 768K/128K Mo. Rate	Infospeed 1.5M/128K Mo. Rate	Infospeed 1.5M/384K Mo. Rate	
A	50	100	150	200	250	\$28.95	\$28.95	\$28.95	(S) (x)
B	400	800	1,200	1,600	2,000	27.95	27.95	27.95	(S) (x)
C	50,000	100,000	150,000	200,000	250,000	26.95	26.95	26.95	(S) (x)

CL	SY1	SY2	SY3	SY4	SY5	Verizon	Verizon	Verizon	
						Infospeed 7.1M/768K Mo. Rate	Infospeed 384K/384K Mo. Rate	Infospeed 768K/768K Mo. Rate	
A	50	100	150	200	250	\$92.95	\$40.00	\$56.00	(S) (x)
B	400	800	1,200	1,600	2,000	87.95	38.00	54.00	(S) (x)
C	50,000	100,000	150,000	200,000	250,000	81.95	34.00	50.00	(Z)

Note: CL = Annual Commitment Level (billed lines in service)
 SY = Subscription Year
 Mo. Rate = Monthly Rate

(x) Reissued material originally filed under Transmittal No. 429 and
 scheduled to become effective April 27, 2004

(Issued under Transmittal No. 431)

Issued: April 15, 2004

Effective: April 18, 2004

Vice President, Federal Regulatory
 1300 I Street, NW, Washington, D.C. 20005

**Docket No. UT-040788
VERIZON GRC & INTERIM REQUEST**

SERVICE LIST

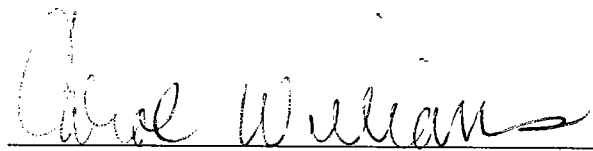
VERIZON NORTHWEST, INC.: Judith A Endejan Graham & Dunn PC 2801 Alaskan Way Suite 300 Seattle, WA 98121-1128	COMMISSION STAFF: Donald Trotter Chris Swanson Assistant Attorney Generals P.O. Box 40128 1400 S. Evergreen Park Dr. SW Olympia WA 98504 0128
CITIZENS' UTILITY ALLIANCE OF WASHINGTON: John O'Rourke Director 212 W 2 ND Ave Suite 100 Spokane WA 99201	WeBTEC: Arthur A Butler Ater Wynne LL 601 Union St Suite 5450 Seattle WA 98101 2327
NORTHWEST PUBLIC COMMUNICATIONS COUNCIL: Brooks E Harlow Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle WA 98101 2352	AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST: Gregory J Kopta Davis Wright Tremaine LLP 2600 Century Square 1501 Fourth Avenue Seattle WA 98101 1688
THE UNITED STATES DEPARTMENT OF DEFENSE: Stephen S Melnikoff Regulatory Law Office of Attorney General U.S. Army Litigation Ctr. Office of the Judge Advocate General 901 N Stuart St Ste 700 Seattle WA 98164	AARP: Ronald L. Roseman Attorney at Law 2011 - 14 th Avenue East Seattle, WA 98112
INTEGRA Karen J Johnson Corporate Regulatory Attorney Integra Telecom of Washington, Inc 1201 NE Lloyd Blvd Suite 500 Portland, OR 97232	

CERTIFICATE OF SERVICE
Docket No. UT-040788

I hereby certify that a true and correct copy of Public Counsel's Cross Examination Exhibit (Verizon Response to Public Counsel Data Request No. 6) in a sealed envelope and a redacted copy of the cross examination exhibit was sent to each of the parties of record shown on the attached Service List in sealed envelopes. Confidential versions were provided to parties who have signed the protective order. All copies were sent via:

- First class mail, postage prepaid
- E-Mail
- Facsimile transmission
- UPS Two-Day Air, freight prepaid
- Federal Express, freight prepaid (overnight)

DATED: August 6, 2004.



CAROL WILLIAMS
Legal Assistant