GRAHAM & DUNN PC

August 6, 2004

JUDITH A. ENDEJAN (206) 340-9694 jendejan@grahamdunn.com

VIA EXPRESS MAIL

Ms. Carole Washburn
Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

Re: WUTC v. Verizon Northwest Inc.
Docket No. UT-040788

Dear Ms. Washburn:

Enclosed please find fifteen (15) copies of what has now been marked as Exhibit 162 in the Interim Rate Case proceeding in the above docket. Pursuant to the request of ALJ Wallis, we are submitting the following:

- Fifteen (15) copies of this confidential exhibit on yellow paper with the confidential portions highlighted, in a sealed envelope;
- Fifteen copies of a redacted version of the above confidential document.

Verizon claims this information to be confidential and valuable commercial information in that it depicts market share information for the Washington intralata toll market for 2000 to 2001. Generally, market share information is deemed confidential pursuant to WAC 480-07-160(c). In addition to Verizon Northwest Inc., all of its competitors for intralata toll services might be directly affected by disclosure of the confidential information. Such competitors include but are not limited to AT&T Communications of the Northwest, Inc. and MCI/Worldcom. We would appreciate if you would substitute this filing for that made on August 4, 2004. Thank you.

GRAHAM & DUNN PC

Carole Washburn August 6, 2004 Page 2

Sincerely,

GRAHAM & DUNN PC

Gudith A. Endejan

Enclosures jae/sbj

cc:

All Parties (w/encl.)

m29664-526227.doc

CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of August 2004, served the true and correct original along with the correct number of copies, of the attached document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Ms. Carole Washburn Secretary Washington Utilities and Transportation Commission P.O. Box 47250 1300 South Evergreen Park Dr. S.W. Olympia, WA 98504-7250	U.S. Mail, Postage Prepaid Hand Delivered X Overnight Mail (Federal Express) Facsimile (360) 586-1150 Email (records@wutc.wa.gov)
I hereby certify that I have this 6 th day	of August 2004, served a true and correct copy of
the attached document upon parties of record,	via the method(s) noted below, properly addressed
as follows:	
On Behalf of Public Counsel: Simon ffitch Assistant Attorney General Public Counsel 900 4th Avenue, Suite 2000 Seattle, WA 98164	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206) 389-2058 Email (simonf@atg.wa.gov)
Robert C. Wallis Administrative Law Judge Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (360) 586-8203 Email (bwallis@wutc.wa.gov
On Behalf of The Washington Electronic Business & Telecommunications Coalition ("WeBTEC"): Arthur A. Butler Ater Wynne, LLP 601 Union Street Suite 5450 Seattle, WA 98101	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-467-8406) Email (aab@aterwynne.com)

On Behalf of AARP: Ronald L. Roseman Columbia Legal Services 2011 14th Avenue E. Seattle, WA 98112	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-568-0138) Email (ronaldroseman@comcast.net)
On Behalf of Commission Staff: Don Trotter Attorney General of Washington Utilities & Transportation Division 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (360-586-5522) Email (dtrotter@wutc.wa.gov)
Christopher G. Swanson Attorney General of Washington Utilities & Transportation Division 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (360-586-3564) Email (cswanson@wutc.wa.gov)
On Behalf of Integra Telecom of Washington: Karen J. Johnson Integra Telecom of Washington, Inc. 1201 NE Lloyd Blvd, Suite 500 Portland, OR 97232	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (503-748-1955) Email (karen.johnson@integratelecom.com)
On Behalf of AT&T Communications of the Pacific Northwest (AT&T): Gregory J. Kopta Davis Wright Tremaine LLP 2600 Century Square 1501 Fourth Avenue Seattle, WA 98101-1688	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-628-7699 Email (gregkopta@dwt.com)
Letty S.D. Friesen AT&T 1875 Lawrence Street, Room 1575 Denver, CO 80202	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (303-298-6501 Fmail (Isfriesen@att.com)

On Behalf of Northwest Public Communications Council (NPCC): Brooks E. Harlow Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352 David L. Rice Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-622-7485) Email (brooks.harlow@millernash.com) X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-622-7485) Email (david.rice@millernash.com)				
On Behalf of Citizens' Utility Alliance of Washington: John O'Rourke Citizens' Utility Alliance 212 W. Second Avenue, Suite 100 Spokane, WA 99201	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (509-744-3374) Email (orourke@snapwa.org)				
On Behalf of The United States Department of Defense: Stephen S. Melnikoff Regulatory Law Office U.S. Army Litigation Ctr. Office of the Judge Advocate General 901 N. Stuart Street, Suite 700 Arlington, VA 22203-1837	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (703-696-1643) Email (stephen.melnikoff@hqda.army.mil				
I declare under penalty of perjury under	the laws of the State of Washington that the				
foregoing is true and correct. DATED this day of August, 2004,	•				
By Nancy E. Dickerson Legal Secretary					

Docket No.	UT-040788
Exhibit	

Docket No. UT-020406 Verizon Northwest Inc. Opening Brief Attachment B

Attachment B

(Confidential per Protective Order in Docket No. UT-020406)

Page 1 of 1

VERIZON NORTHWEST INC. - WASHINGTON INTRALATA TOLL MARKET SHARE 2000-2001

					**
2002	2001	2000	1999	1998	Year
					Verizon Northwest Presubscribed Intralata Toll Lines (A)
				i	Verizon Affiliate Presubscribed Intralata Toll Lines (B)
			٠		Total Verizon Presubscribed Intralata Toll Lines (C) = (A) + (B)
					Total · Verizon Northwest Switched Access Lines (D)
					Verizon Northwest Intralata Toll Market Share (E) = (A) / (D)
					Verizon Affiliate Intralata Toll Market Share (F) = (B) / (D)
				(9) = (9) (9)	Total Verizon Intralata Toll Market Share

REDACTED

Source of Data:

Column (A) - Exhibit 212C (Verizon Response to AT&T Data Request No. 63b) Column (B) - Exhibit 204C (Verizon Response to AT&T Data Request No. 63c) Column (D) - Exhibit 212C (Verizon Response to AT&T Data Request No. 63a)

VERIZON CONFIDENTIAL (Confidential per Protective Order in WUTC Docket No. UT-020406)