

February 19, 2003

Theodora Mace, Administrative Law Judge  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: *Verizon Northwest, Inc.*, Docket No. UT-011439  
Commission Staff Request to Add Qwest's Late-Filed Supplemental  
Responses to Data Requests As Exhibits to the Record

Dear Judge Mace:

Commission Staff requests that the Commission admit, as exhibits to the record in this case, the late-filed supplemental responses of Qwest to Staff's Data Requests 34, 35, 36, 37, 38, and 39 in the above-referenced docket. (Copies of supplemental responses are attached.) These are responses to data requests that were the subject of a Staff motion to compel responses, which the Commission granted on January 17, 2002. Qwest, however, indicated that it would not be able to provide complete responses to these requests before the close of hearing, but would do so afterwards.

Qwest provided complete supplemental responses to Staff Data Requests 36 and 37 on February 19, 2003 (today), and complete supplemental responses to Staff Data Requests 34, 35, 38, and 39 on February 12, 2003.

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Staff thus requests that these supplemental responses be entered as exhibits and made part of the record in this case. Staff has discussed this matter with counsel for Qwest, who has confirmed that Qwest has no objection to this request.

Very truly yours,

Gregory J. Trautman  
Assistant Attorney General  
Counsel for Commission Staff

GJT:kl  
Attachments  
cc: All parties