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October 6, 2004

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VIA E-MAIL AND U.S. MAIL

Ms. Carole Washburn, Executive Secretary
Washington Utilities & Transportation Committee
1300 Evergreen Park Drive, SW
Olympia, WA 98504

Re: Docket No. UT-043013

Dear Ms. Washburn:

Enclosed for filing is an original and six copies of a corrected signature page to Verizon's "Answer to MCI's Petition for Review of Order No. 10 and Petition to Vacate Order No. 10" which was filed on October 4, 2004, as well as a Certificate of Service. Messrs. Carrathers and McBride were inadvertently left off the signature page. Ms. Caswell and Messrs. Panner and Angstreich were inadvertently included. Counsels' names are now correctly stated.

Please contact us if you have any questions and thank you for your assistance.

Very truly yours,

A handwritten signature in cursive script that reads "Heidi L. Wilder".

Heidi L. Wilder
Assistant to John H. Ridge

Enclosures

cc: ALJ Ann Rendahl
Parties of Record

BEFORE THE WASHINGTON UTILITIES
AND TRANSPORTATION COMMISSION

In the Matter of the Petition for Arbitration)	DOCKET NO. UT-043013
Of an Amendment to Interconnection)	
Agreements of)	
VERIZON NORTHWEST INC.)	VERIZON'S ANSWER TO
With)	MCI'S PETITION FOR
COMPETITIVE LOCAL EXCHANGE)	REVIEW OF ORDER NO. 10
CARRIERS AND COMMERCIAL)	AND PETITION TO VACATE
MOBILE RADIO SERVICE PROVIDERS)	ORDER NO. 10
IN WASHINGTON)	
Pursuant to 47 U.S.C. Section 252(b) and)	
The Triennial Review Order.)	
_____)	

1. Verizon Northwest Inc. ("Verizon") hereby files its Answer to MCI's Petition for Review of Order No. 10 ("Petition"). As permitted by the ALJ's Notice Granting Request (Sept. 22, 2004), this Answer also presents additional issues for review and requests that Order No. 10 be vacated.

I. INTRODUCTION

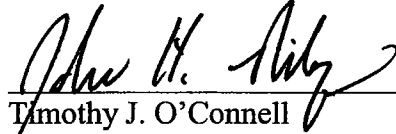
2. MCI's Petition must be dismissed for procedural reasons or denied on the merits. MCI's first argument—that it cannot submit resale orders because it places orders only through EDI—is wrong as a matter of fact. The unrebutted evidence presented at the September 9 hearing shows that MCI has placed *hundreds* of local service orders with Verizon in Washington using Verizon's "WISE" Web/GUI interface.

3. MCI's second argument—that Order No. 5 requires Verizon to unbundle its packet switch—was already rejected by the Commission in this docket. As MCI admits, it and other CLECs asked the Commission to "clarify" Order No. 5 to require

26. Order No. 10 is unlawful on procedural and substantive grounds, and therefore must be vacated.

Dated this 4 day of October, 2004.

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that I have this 6th day of October, 2004, served the true and correct original, along with the correct number of copies, of *Verizon's corrected signature page to its Answer to MCI's Petition for Review of Order No. 10 and Petition to Vacate Order No. 10* and a *Certificate of Service* upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn, Executive Secretary
Washington Utilities & Transportation
Commission
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Hand Delivered
 U.S. Mail (1st class, postage prepaid)
 Overnight Mail
 Facsimile (360) 586-1150
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I hereby certify that I have this 6th day of October, 2004, served a true and correct copy of the foregoing documents upon parties noted below via E-Mail and U.S. Mail:

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I hereby certify that I have on the 6th day of October, 2004, served true and correct copies of the foregoing documents upon parties noted below via U.S. Mail:

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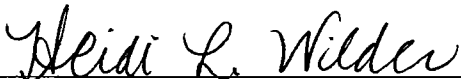
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I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

DATED this 6th day of October, 2004, at Seattle, Washington.


Heidi L. Wilder