BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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| In the Matter of Frontier Communications Northwest, Inc.’s Petition to be Regulated as a Competitive Telecommunications Company Pursuant to RCW 80.26.320 | DOCKET UT-121994COMMISSION STAFF’S MOTION TO STRIKE RESPONSE OF FRONTIER COMMUNICATIONS NORTHWEST, INC. |

**I. INTRODUCTION**

1. Staff of the Washington Utilities and Transportation Commission (Commission) submits this Motion to Strike the Response by Frontier Communications Northwest, Inc. to Commission Staff’s Motion to Clarify Order 04 (Response) under the procedural rules WAC 480-07-835 and WAC 480-07-375(1)(d).

**II. BACKGROUND AND ARGUMENT**

1. On Monday, April 8, Commission Staff (Staff) filed with the Commission a Motion to Clarify Order 04 (Staff Motion). In the Staff Motion, Staff specifically cites WAC 480-07-835 as the authority for bringing the motion. Pursuant to WAC 480-07-835(3), “No party may file a response to a motion for clarification unless requested by the commission.” To date, the Commission has not requested a response to Staff’s motion from any party.
2. On Monday, April 15, 2013, Frontier Communications Northwest, Inc. (Frontier) filed its Response with the Commission. In its filing, Frontier does not seek the Commission’s permission to file the Response; rather the company disregards WAC 480-07-835(3) entirely and presents the Response without citation to any authority for the filing. Because Frontier’s filing is expressly prohibited under the applicable rule, WAC 480‑07‑835(3), Staff respectively requests that the Commission strike the Response.

DATED this 15th day of April, 2013.

 Respectfully submitted,

ROBERT W. FERGUSON

Attorney General

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JENNIFER CAMERON-RULKOWSKI

Assistant Attorney General

Counsel for Washington Utilities and

Transportation Commission Staff