

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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-121994

COMMISSION 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**

2 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.

3 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 respectfully requests that the Commission strike the Response.

DATED this 15th day of April, 2013.

Respectfully submitted,

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