

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T COMMUNICATIONS OF	)	
THE PACIFIC NORTHWEST, INC.	)	
	)	Docket No. UT-020406
Complainant,	)	
	)	AT&T/WORLDCOM ISSUES LIST
v.	)	
	)	
VERIZON NORTHWEST INC.,	)	
	)	
Respondent.	)	
_____	)	

Pursuant to directions from the Administrative Law Judge during the June 12, 2002 prehearing conference in the above-captioned proceeding, AT&T Communications of the Pacific Northwest, Inc. (“AT&T”) and WorldCom, Inc. (“WorldCom”), provide the following list of issues to be resolved in this proceeding.

**ISSUES**

1. Do Verizon Northwest Inc.’s (“Verizon’s”) intrastate switched access charges, in conjunction with the forward-looking other costs incurred to provide toll service, create a price squeeze with the intrastate toll prices charged by Verizon and its affiliates in violation of RCW 80.36.186 and prior Commission orders? If so, should the Commission remedy that violation by requiring Verizon to lower its switched access charges?

2. Does the amount by which Verizon’s intrastate switched access charges exceed the forward-looking costs of that service provide Verizon with an undue preference or

competitive advantage over AT&T, WorldCom, and other competing interexchange carriers (“IXCs”) in violation of RCW 80.36.186?

3. Are Verizon’s switched access charges discriminatory in violation of RCW 80.36.180 when those charges are several times higher than the rates Verizon charges for comparable unbundled network elements (“UNEs”) and reciprocal compensation for the transport and termination of local exchange traffic and traffic bound for Internet Service Providers (“ISPs”)?

4. To the extent that Verizon’s switched access charges include subsidies that Verizon allegedly uses to fund universal service objectives, do those charges violate 47 U.S.C. § 254(f)?

5. Does the level of Verizon’s switched access charges in relation to (a) the retail prices charged by Verizon and its affiliates for toll or other services, and (b) the rates Verizon charges for comparable UNEs and reciprocal compensation for the transport and termination of local exchange and ISP-bound traffic, have the effect of prohibiting the ability of other carriers to provide intrastate telecommunications services in violation of 47 U.S.C. § 253?

DATED this 21st day of June, 2002.

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