GRAHAM & DUNN PC

August 20, 2004

NANCY E. DICKERSON LEGAL SECRETARY (206) 340-9381 ndickerson@grahamdunn.com

VIA FACSIMILE, E-MAIL & FEDERAL EXPRESS

Ms. Carole Washburn
Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

Re: WUTC v. Verizon Northwest Inc.

Docket No. UT-040788

Dear Ms. Washburn:

Enclosed please find the original and 15 copies of Verizon Northwest Inc.'s Opposition to Staff's Motion to Compel. Please stamp one of the copies and return it to us in the enclosed stamped self-addressed envelope provided for your convenience.

If you should have any questions, please contact me. Thank you.

Sincerely,

GRAHAM & DUNN PC

Nancy E. Dickerson Legal Secretary

Enclosure

cc:

All Parties (via email)

Marey & Deckerson

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CERTIFICATE OF SERVICE

I hereby certify that I have this 20th day of August 2004, served the true and correct original along with the correct number of copies, of the attached document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Ms. Carole Washburn Secretary Washington Utilities and Transportation Commission P.O. Box 47250 1300 South Evergreen Park Dr. S.W. Olympia, WA 98504-7250	U.S. Mail, Postage Prepaid Hand Delivered X Overnight Mail (Federal Express) X Facsimile (360) 586-1150 X Email (records@wutc.wa.gov)
I hereby certify that I have this 20 th day	of August 2004, served a true and correct copy of
the attached document upon parties of record,	via the method(s) noted below, properly addressed
as follows:	
On Behalf of Public Counsel: Simon ffitch Assistant Attorney General Public Counsel 900 4th Avenue, Suite 2000 Seattle, WA 98164	 X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206) 389-2058 X Email (simonf@atg.wa.gov)
Robert C. Wallis Administrative Law Judge Washington Utilities and Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250	 X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (360) 586-8203 X Email (bwallis@wutc.wa.gov
On Behalf of The Washington Electronic Business & Telecommunications Coalition ("WeBTEC"): Arthur A. Butler Ater Wynne, LLP 601 Union Street Suite 5450 Seattle, WA 98101	X_ U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-467-8406) X Email (aab@aterwynne.com)

On Behalf of AARP: Ronald L. Roseman Columbia Legal Services 2011 14th Avenue E. Seattle, WA 98112	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-568-0138) X Email (ronaldroseman@comcast.net)
On Behalf of Commission Staff: Don Trotter Attorney General of Washington Utilities & Transportation Division 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (360-586-5522) X Email (dtrotter@wutc.wa.gov)
Christopher G. Swanson Attorney General of Washington Utilities & Transportation Division 1400 S. Evergreen Park Drive SW P.O. Box 40128 Olympia, WA 98504-0128	XU.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (360-586-3564) XEmail (cswanson@wutc.wa.gov)
On Behalf of Integra Telecom of Washington: Karen J. Johnson Integra Telecom of Washington, Inc. 1201 NE Lloyd Blvd, Suite 500 Portland, OR 97232	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (503-748-1955)X Email (karen.johnson@integratelecom.com)
On Behalf of AT&T Communications of the Pacific Northwest (AT&T): Gregory J. Kopta Davis Wright Tremaine LLP 2600 Century Square 1501 Fourth Avenue Seattle, WA 98101-1688	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-628-7699 X Email (gregkopta@dwt.com)
Letty S.D. Friesen AT&T 1875 Lawrence Street, Room 1575 Denver, CO 80202	X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (303-298-6501 X Email (lsfriesen@att.com)

On Behalf of Northwest Public Communications Council (NPCC): Brooks E. Harlow Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352 David L. Rice Miller Nash LLP 4400 Two Union Square 601 Union Street Seattle, WA 98101-2352	XU.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-622-7485) X Email (brooks.harlow@millernash.com) X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (206-622-7485) X Email (david.rice@millernash.com)
On Behalf of Citizens' Utility Alliance of Washington: John O'Rourke Citizens' Utility Alliance 212 W. Second Avenue, Suite 100 Spokane, WA 99201	 X U.S. Mail, Postage Prepaid Hand Delivered Overnight Mail Facsimile (509-744-3374) X Email (orourke@snapwa.org)
On Behalf of The United States Department of Defense: Stephen S. Melnikoff Regulatory Law Office U.S. Army Litigation Ctr. Office of the Judge Advocate General 901 N. Stuart Street, Suite 700 Arlington, VA 22203-1837	XU.S. Mail, Postage PrepaidHand DeliveredOvernight MailFacsimile (703-696-1643)XEmail (stephen.melnikoff@hqda.army.mil)
I declare under penalty of perjury under foregoing is true and correct. DATED this day of August, 2004,	r the laws of the State of Washington that the at Seattle, Washington.
By 1	Vancy E. Dickerson Legal Secretary