

**BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION**

IN THE MATTER OF THE PETITION)	
OF AT&T COMMUNICATIONS OF)	DOCKET NO.
THE PACIFIC NORTHWEST, INC.,)	
TCG SEATTLE & TCG OREGON FOR)	REQUEST TO OPEN DOCKET
APPROVAL OF AN ALTERNATIVE)	AND MOTION FOR EXTENSION
MEASUREMENT OF SERVICE)	OF TIME
QUALITY REPORTING PURSUANT)	
TO WAC 480-120-439(12))	

Pursuant to WAC 480-120-439(12) and WAC 480-07-130(2),¹ AT&T Communications of the Pacific Northwest, Inc.; TCG Seattle and TCG Oregon (collectively “AT&T”) hereby request that the Washington Utilities and Transportation Commission (“WUTC”) open a docket in which to receive and review AT&T’s petition for an alternative measurement proposal for the service quality reporting required by WAC 480-120-439. In addition, AT&T seeks— through this filing—an extension of time to file its first reports and the actual petition for alternative measurement. AT&T needs up to and including September 30, 2004; thus, it anticipates filing its petition and reports on October 1, 2004. As grounds therefore, AT&T states as follows:

1. On July 7, 2004, AT&T received a notice from the WUTC’s Mr. Blackmon informing AT&T that it had become a “Class A” telecommunications provider as that term is defined in WAC 480-120-302(1)(a).² Class A companies are required to provide certain service quality reports to the WUTC on varying schedules (*e.g.*, monthly, quarterly, bi-annually, or upon request).

¹ WAC 480-07-130(2) (“The commission may modify the time limits stated in a commission rule, subject to other requirements of law”).

² The Class A designation means that a company and its affiliates serve at least 2 % of the total access lines in the State of Washington.

2. As a consequence of becoming a Class A company, AT&T's obligation to produce, at least the monthly reports, would begin on or about the August 31, 2004 through September 7, 2004 time frame (*i.e.*, 30-days from the first month's measurements apparently starting roughly in July).³ WAC 480-120-439(1).

3. Upon receiving the notice, AT&T met first with Mr. Blackmon and Ms. Johnston and then—at Mr. Blackmon's suggestion—with Mr. Williamson, Ms. Russell, Ms. Reynolds and Ms. Smith. The purpose of these meetings was to inform Staff of the difficulties AT&T encountered in attempting to employ many of the measurement requirements of WAC 480-120-439 that are based upon traditional legacy wire-line networks, among other things.

4. During the first meeting, Mr. Blackmon graciously shared his view of what the rule's requirements were attempting to accomplish and AT&T took those points to incorporate in the meeting with Mr. Williamson and Ms. Russell on the technical issues. At present, AT&T is developing, collecting and measuring certain material in a way it anticipates will meet both its ability to report while addressing the issues raised by Staff. Unfortunately, the process is not moving as quickly as hoped and AT&T would like the opportunity to meet once more with Staff before presenting its first reports, petition and alternative measurements to the WUTC.

5. In order to do that, AT&T must seek both a waiver of the time in which it must file its first monthly reports and push out the time in which it will actually submit its petition with the alternative proposal. Hence, this motion for an extension of time and

³ Depending upon how one interprets WAC 480-120-439(1), the first monthly report appears to require a full month's measurement, which would mean that AT&T's first monthly report would not be due until the end of September when it could obtain a full month's measurement from August because it received notice on July 7th that it had become a Class A company. Nonetheless, AT&T has been working to collect and develop the appropriate measurements beginning with its July data.

request to open the docket. As a procedural matter, AT&T believes this approach is the best way to inform the Commission of the upcoming filing while obtaining a docket in which to collect all relevant, related material.

6. Because AT&T's request does not prejudice anyone and aids in providing the best result for the WUTC, the public and the company, AT&T requests that the Commission grant this request and motion.

Respectfully submitted this 30th day of August 2004.

**AT&T COMMUNICATIONS OF THE
PACIFIC NORTHWEST, INC. AND
AT&T LOCAL SERVICES ON
BEHALF OF TCG SEATTLE AND
TCG OREGON**

By: _____
Mary B. Tribby
Letty S.D. Friesen
AT&T Law Department
1875 Lawrence Street, Suite 1575
Denver, Colorado 80202
(303) 298-6475