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BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of) Docket No. UT-061298
VERIZON NORTHWEST INC.) AMENDMENT TO
For Waiver of WAC 480-120-071) AMENDED PETITION FOR WAIVER OF
VERIZON NORTHWEST INC.

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11 1. This amendment to amended petition is brought by Verizon Northwest Inc.
12 (“Verizon”), 1800 41st Street, Everett, Washington 98201. Verizon is represented on this matter
13 by:

14 Thomas F. Dixon
15 Assistant General Counsel - Northwest Region
16 Verizon
17 707 – 17th Street, #4200
18 Denver, Colorado 80202
19 Phone: (303)390-6206
20 Fax: (303)390-6333

21 2. As previously described in Verizon’s amended petition, Verizon seeks a waiver
22 from the requirements of WAC 480-120-071(2)(b) pursuant to WAC 480-120-071(7)(a). The
23 waiver process set forth in WAC 480-120-071(7)(a) recognizes that certain requested line
24 extensions pose unreasonable costs and burdens, and thus should not be undertaken. Under
25 WAC 480-120-071(a), the Commission may – although it is not required to – rely on the factors
26 set forth in WAC 480-120-071(b)(ii) and any other information it considers necessary to analyze
27 a proposed line extension. In the alternative, Verizon seeks a waiver of WAC 480-120-071(3)(a)
28 pursuant to WAC 480-120-071(7)(b) and WAC 480-120-015.

29 3. This amendment to the amended petition is submitted because Verizon has
30 received an additional request for service from Verizon from Serge Connan in the vicinity of the
31 Platt¹ location as described below. Rather than filing another amended petition, Verizon files

¹ Mr. Platt sold the property to Steve and Sherry Hussey as described in the amended petition.

1 this amendment to the amended petition on file in order to advise the Commission of this new
2 request for service.

3 4. Connan Location.

4 Mr. Serge Connan placed a service order with Verizon for residential telephone service at
5 163 White Tail Lane in Tonasket, Washington, which property is immediately adjacent to and
6 contiguous with to the Platt/Hussey property. The requested service location is approximately
7 twenty-five miles from Tonasket in Verizon's Tonasket Exchange in an area called Cape
8 Labelle. It is off of Aeneas Valley Road, and generally consists of parcels of twenty acres or
9 more, located on primitive roads. If the Connan line extension is constructed, it would be served
10 from the same pedestal as the Platt/Hussey line extension. Therefore, there is no incremental
11 increase in the costs to serve the Connan property from the costs previously described to serve
12 the Platt/Hussey, Pitsker and Impero locations.

13 5. All of the facts and arguments previously stated in the amended petition remain
14 the same, except to add the Connan property to the line extension requests at issue in the
15 amended petition.

16 6. An analysis of the factors set forth in WAC 480-120-071(b)(ii) demonstrate that
17 service should not be extended to these locations, including the Connan property:

18 a. Cost of the extension (WAC 480-120-071(b)(ii)(A)). It would cost a total
19 of \$163,000 (as further described in Confidential Attachment E to the amended petition)
20 to extend facilities to these five locations. This would be an extraordinary cost to impose
21 to serve five customers.

22 b. The number of customers to be served (WAC 480-120-071(b)(ii)(B)).
23 Only five potential customers are involved.

24 c. The comparative price and capabilities of radio communication service or
25 other alternatives available to customers (WAC 480-120-071(b)(ii)(C)). Based on
26 Verizon personnel's field visits, cellular service is not available at any of these locations.

1 Satellite telephone service, however, is generally available in the area.² A variety of
2 satellite telephone service plans are available, with monthly fees as low as \$39.95 and
3 effective per minute charges as low as \$0.14 for calls anywhere in the U.S. and Canada.³

4 d. Technological difficulties and physical barriers presented by the requested
5 extensions (WAC 480-120-071(b)(ii)(D)).

6 (i) The technological and physical barriers to extending and
7 maintaining service to the Bush location are detailed in Paragraphs 4-7 of the amended
8 petition.

9 (ii) The technological and physical barriers to extending and
10 maintaining service to the Platt/Hussey, Pitsker and Impero locations are detailed in
11 Paragraphs 8-13 of the amended petition. The Connan property creates no additional
12 technological and physical barriers than those previously described.

13 e. The effect on the individuals and communities involved (WAC 480-120-
14 071(b)(ii)(E)). The effect on the five individuals requesting service would not be
15 commensurate with the expense to be incurred by the ratepayers to subsidize their
16 service. They are not part of any community and there would be minimal, if any,
17 beneficial effect to the nearest communities by extending service to these five locations.

18 f. The effect on the public switched network (WAC 480-120-071(b)(ii)(F)).
19 Verizon would have to reallocate significant funds that otherwise would have been used
20 to provide maintenance, upgrades and other extensions to the public switched network for
21 more of its customers. Diverting technicians to these remote locations – especially in
22 harsh weather conditions that could increase travel and work times – could prevent those
23 technicians from meeting other customers' needs.

² Verizon does not know at this time whether any line of sight requirements would be met at these locations.

³http://www.globalsatellite.us/prod_detail.aspx?Product_ID=667&Nav_ID=453 ,
http://www.daysatphones.com/voice_pricing.htm

1 g. The effect on the company (WAC 480-120-071(b)(ii)(G)).

2 Misallocating Verizon's limited capital and expense dollars would harm
3 Verizon's overall ability to serve its customers in the affected exchanges in order to add
4 only five customers, and the extra maintenance burdens would impact Verizon's ability
5 to provide service to its other customers.

6 7. In the alternative, for all the reasons stated in Section III.A of the amended
7 petition, including the analysis of the WAC 480-120-071(b) factors set forth in paragraph 16.a –
8 g. of the amended petition and paragraph 6.a-g. above,⁴ Verizon and its ratepayers should not be
9 forced to pay for the extension of service to these five applicants. Thus, if the Commission
10 requires Verizon to build the line extensions necessary to serve these five locations, recovery of
11 Verizon's costs associated from such extensions would be appropriate.

12 SUMMARY

13 It would be unreasonable for Verizon to undertake such disproportionately expensive
14 construction in light of the nominal, at best, benefit of adding only five customers to its network.
15 Thus, Verizon brings forward this case for waiver of the line extension rule in order to protect its
16 existing and future customers and employees. The facts and circumstances of these five
17 requests for service from Verizon warrant granting Verizon an exemption from, or waiver of, the
18 WAC 480-120-071 obligation to extend service to these locations. If the Commission decides to
19 require extension of service to any or all of these locations, then it should permit Verizon to
20 recover the costs of these extensions directly from the applicants causing the costs to be
21 incurred, rather than from its other ratepayers.

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23

⁴ Although these factors apply to waiver requests under WAC 480-120-071(b), Verizon's request that this
Petition also be considered under WAC 480-120-015 enables the Commission to provide for recovery of
costs without specific findings under those factors.

1 Respectfully submitted this 28th day of November 2006.
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4 VERIZON NORTHWEST INC.

5 By /s/ Thomas F. Dixon by pl
6 Thomas F. Dixon, Assistant General Counsel
7 Northwest Region
8 Verizon
9 707 - 17th Street, #4200
10 Denver, Colorado 80202
11 (303) 390-6206
12 888-475 7218, ext. 3 (toll free)
13 thomas.f.dixon@verizon.com
14

VERIFICATION

I, Jan Davies, Engineer for Verizon Northwest, Inc., have personally inspected the properties located at 463 Sqove Road , 41 White Tail Lane, 96 White Tail Lane, 162 White Tail Lane and 163 White Tail Lane as well as the roads leading to the property and the nature of the conditions at or near the property. I do attest to the accuracy of the factual statements contain in the foregoing amended petition to the best of my knowledge and belief.

Jan Davies

Jan Davies

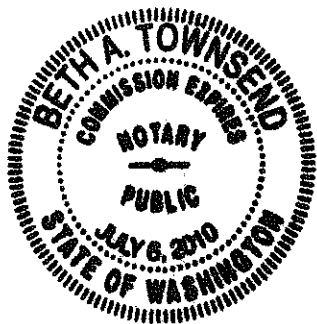
Subscribed and sworn to before me this 21st day of November, 2006, by Jan Davies.

Beth A Townsend

Notary Public

Beth A Townsend

Commisson Exp 7/6/10



1 CERTIFICATE OF SERVICE

2
3 I HEREBY CERTIFY THAT I did on November 28, 2006, send a true and exact copy of
4 the within amendment to amended petition and attachments by U S Mail, first class postage,
5 prepaid, addressed to:

6
7 Ed Bush
8 463 Sqove Road
9 Molson, WA 98859

Jim Platt
11661 SE 1st ST, Studio 207
Bellevue, WA 98005

10
11 Steve and Sherry Hussey
12 8708 Laguna Dr SW
13 Olympia, WA 98512

Serge Connan
4228 SE Evergreen Street
Portland, OR 97206

14
15 Anja Pitsker
16 1440 - 23rd Street, Apt 106
17 Santa Monica, CA 90404

Leeann Impero
5968 Pearl Lane
Ferndale, WA 98248

18
19 The following addresses are listed by the United States Postal Service as "Non-deliverable" and
20 that "Mail sent to this address will be returned."

21
22 Anja Pitkser
23 41 White Tail Lane
24 Tonasket, WA 98855

Leeann Impero
96 White Tail Lane
Tonasket, WA 98855

25
26 Steve and Sherry Hussey
27 162 White Tail Lane
28 Tonasket, WA 98855

Jim Platt
162 White Tail Lane
Tonasket, WA 98855

29
30 Mr. Serge Connan
31 163 White Tail Lane
32 Tonasket, WA 98855

33
34
35 Dated: November 28, 2006

36 
Patti Lane