

**MILLER | NASH** LLP  
ATTORNEYS AT LAW

Miller Nash LLP  
www.millernash.com  
4400 Two Union Square  
601 Union Street  
Seattle, WA 98101-1367  
(206) 622-8484  
(206) 622-7485 fax

3400 U.S. Bancorp Tower  
111 S.W. Fifth Avenue  
Portland, OR 97204-3699  
(503) 224-5858  
(503) 224-0155 fax

500 E. Broadway, Suite 400  
Post Office Box 694  
Vancouver, WA 98666-0694  
(360) 699-4771  
(360) 694-6413 fax

Brooks E. Harlow  
brooks.harlow@millernash.com  
(206) 777-7406 direct line

December 30, 2004

**HAND-DELIVERED, EMAILED**

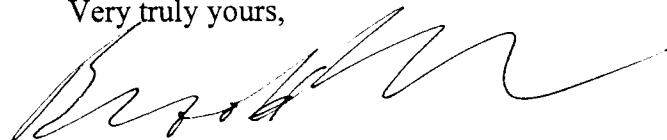
Ms. Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
Olympia, Washington 98504-7250

Subject: Joint Motion For Stay—**EXPEDITED TREATMENT REQUESTED**  
Docket No. UT-043013

Dear Ms. Washburn:

Enclosed, for filing, are an original and two copies of the Joint Motion For Stay Of Procedural Order No. 13 And Petition For Interlocutory Review in the above-referenced docket. **Because the motion seeks to stay or modify a filing currently scheduled for January 5, 2005, the movants respectfully request expedited treatment of the motion and petition.**

Very truly yours,



Brooks E. Harlow

cc w/enc: All Parties of Record

CERTIFICATE OF SERVICE  
UT-043013

I hereby certify that a true and correct copy of the foregoing has been provided via electronic mail and U.S. Mail, postage prepaid to the following parties:

DIRECTOR – CONTRACT PERFORMANCE &  
ADMINISTRATION  
VERIZON WHOLESALE MARKETS  
600 HIDDEN RIDGE  
IRVING TX 75038

RICHARD POTTER  
VICE PRESIDENT  
VERIZON NORTHWEST INC  
PUBLIC POLICY AND EXTERNAL AFFAIRS  
1800 - 41ST STREET  
EVERETT WA 98201

VICE PRESIDENT AND  
ASSOCIATE GENERAL COUNSEL  
VERIZON WHOLESALE MARKETS  
1320 N. COURT HOUSE ROAD, FLOOR 8  
ARLINGTON VA 22201

TIMOTHY J O'CONNELL  
STOEL RIVES  
600 UNIVERSITY ST.  
STE 3600  
SEATTLE WA 98101

AARON M PANNER  
KELLOG, HUBER, HANSEN,  
TODD & EVANS, P.L  
1615 M STREET NW, STE 400  
WASHINGTON DC 20036-3209

PRESIDENT  
TEL WEST COMMUNICATIONS, LLC  
3701 S. NORFOLK STREET, STE 300  
SEATTLE WA 98118

GENERAL COUNSEL  
T-MOBILE USA INC  
12990 SE 38TH ST.  
BELLEVUE WA 98006

JOHN P ANDRIST  
PRESIDENT  
NCI DATA.COM, INC.  
700 B OKOMA DRIVE  
OMAK WA 98841

IRINA ARMSTRONG  
REGULATORY CONTACT  
METROPOLITAN TELECOMMUNICATIONS  
OF WASHINGTON  
44 WALL STREET, FL 14<sup>TH</sup>  
NEW YORK NY 10005

SCOTT BEER  
ICG TELECOM GROUP, INC.  
GOVERNMENT AND EXTERNAL AFFAIRS  
161 INVERNESS DRIVE WEST  
ENGLEWOOD CO 80112

ROBERT BENSON  
TARIFF SUPPORT  
FOX COMMUNICATIONS CORP.  
5210 CARILLON POINT  
KIRKLAND WA 98033

PENNY H BEWICK  
NEW EDGE NETWORK, INC  
D/B/A NEW EDGE NET  
3000 COLUMBIA HOUSE BLVD., STE 106  
VANCOUVER WA 98661

LON E BLAKE  
DIRECTOR OF REGULATORY AFFAIRS  
ADVANCED TELCOM, INC.  
3723 FAIRVIEW INDUSTRIAL DR. SE.  
SALEM OR 97302

KIMBERLEY A BRADLEY  
SENIOR DIRECTOR OF REGULATORY AFFAIRS  
WINSTAR COMMUNICATIONS, LLC  
1850 M STREET, N.W., STE 300  
WASHINGTON DC 20036

MICHAEL J BRADSHAW  
POWERTELNET COMMUNICATIONS, INC.  
PO BOX 1150  
PROSSER WA 99350

STEVEN C CLAY  
PRESIDENT  
NEW ACCESS COMMUNICATIONS, LLC  
801 NICOLLET MALL, STE 350  
MINNEAPOLIS MN 55042

JOHN COONAN  
WASHINGTON RSA NO. 8 LIMITED  
PARTNERSHIP  
C/O INLAND CELLULAR TELEPHONE COMPANY  
PO BOX 171  
ROSLAND WA 98941

CHRIS CROWE  
PAC-WEST TELECOMM, INC.  
1776 MARCH LANE  
STE 250  
STOCKTON CA 95207

BARBARA FILLINGER  
REGULATORY MANAGER  
IONEX COMMUNICATIONS NORTH, INC.  
2020 BALTIMORE  
KANSAS CITY MO 64108

RUDOLPH GEIST  
O1 COMMUNICATIONS OF WASHINGTON, LLC  
770 L ST., STE 960  
SACRAMENTO CA 95814

BECKY GIPSON  
DIRECTOR  
EXCEL TELECOMMUNICATIONS, INC  
REGULATORY AFFAIRS DEPARTMENT  
1600 VICEROY DRIVE  
DALLAS TX 75235

KEN GOLDSTEIN  
METROCALL, INC.  
6677 RICHMOND HIGHWAY  
ALEXANDRIA VA 22306

BERNARD CHAO  
COVAD COMMUNICATIONS COMPANY  
110 RIO ROBLES  
SAN JOSE CA 95134-1813

TOM COOK  
COOK TELECOM, INC.  
2963 KERNER BLVD.  
SAN RAFAEL CA 94901

DALE CROUSE  
PRESIDENT  
PREMIERE COMMUNICATIONS SYSTEMS, INC.  
4509 INTERLAKE AVE. N  
# 110  
SEATTLE WA 98103

MICHAEL E DAUGHTRY  
UNITED COMMUNICATIONS, INC.,  
D/B/A UNICO  
497 SW CENTURY DR., STE 200  
BEND OR 97702

LETTY FRIESEN  
ATTORNEY AT LAW  
AT&T COMMUNICATIONS  
OF THE PACIFIC NORTHWEST  
1875 LAWRENCE STREET, FL 15  
DENVER CO 80202

MR GEOFF GEORGE  
GENERAL MANAGER  
MARATHON COMMUNICATIONS, INC.  
1550 N 34TH ST, # 200  
SEATTLE WA 98109-2904

JOHN GLICKSMAN  
VICE PRESIDENT/GENERAL COUNSEL  
ADELPHIA BUSINESS SOLUTIONS OPERATIONS  
ONE NORTH MAIN ST.  
COUDERSPORT PA 16915

ROBERT T HALE  
PRESIDENT/CEO  
GRANITE TELECOMMUNICATIONS, LLC  
234 COPELAND STREET  
QUINCY MA 02169

KEN HANKS  
SENIOR TAX ANALYST  
INTERNATIONAL TELCOM, LTD.  
417 - 2ND AVENUE WEST  
SEATTLE WA 98119

KARINE HELLWIG  
SPRINT COMMUNICATIONS COMPANY L.P.  
6390 SPRING PKWY  
MS: KSOPHT010-Z2400  
OVERLAND PARK KS 66251-2400

SCHULA HOBBS  
DIRECTOR OF REGULATORY AFFAIRS  
DSLNET COMMUNICATIONS, LLC  
545 LONG WHARF DRIVE, FL 5  
NEW HAVEN CT 06511

KAREN JOHNSON  
CORPORATE REGULATORY ATTORNEY  
INTEGRA TELECOM OF WASHINGTON, INC.  
19545 N.W. VONNEUMANN DR.  
STE 200  
BEAVERTON OR 97006

REX KNOWLES  
XO WASHINGTON, INC  
1111 EAST BROADWAY  
SALT LAKE CITY UT 84111

DEANNE LAIDLER  
US CELLULAR:  
8410 W. BRYN MAWR STE 700  
CHICAGO IL 60631

ARTHUR L MAGEE  
COMPTROLLER  
BUDGET PHONE, INC.  
PO BOX 19360  
SHREVEPORT LA 71149

SAM G MAROPIS  
ASSOCIATE DIRECTOR  
REGULATORY/MUNICIPAL AFFAIRS  
SBC TELECOM, INC.  
1010 N. ST. MARY'S, ROOM 13K  
SAN ANTONIO TX 78215

ROBERT E HEATH  
VICE PRESIDENT  
AMERICAN FIBER NETWORK, INC.  
9401 INDIAN CREEK PARKWAY, STE 140  
OVERLAND PARK KS 66210

TRE HENDRICKS  
ATTORNEY AT LAW  
UNITED TELEPHONE COMPANY  
OF THE NORTHWEST  
902 WASCO STREET  
HOOD RIVER OR 97031

WILLIAM P HUNT III  
VICE PRESIDENT, PUBLIC POLICY  
LEVEL 3 COMMUNICATIONS, LLC  
1025 EL DORADO BLVD  
BROOMFIELD CO 80021

DENNIS KELLEY  
DIRECTOR OF OPERATIONS  
(PROVISIONING)  
1-800-RECONEX, INC. (T633)  
2500 INDUSTRIAL AVENUE  
HUBBARD OR 97032

GREGORY J KOPTA  
DAVIS WRIGHT TREMAINE  
2600 CENTURY SQUARE  
1501 FOURTH AVENUE  
SEATTLE WA 98101-1688

TRUDY M LONGNECKER  
TARIFF & REGULATORY ANALYST  
RCN TELECOM SERVICES, INC.  
105 CARNEGIE CENTER  
PRINCETON NJ 08540

DIMITRI MANDELIS  
PRESIDENT  
COMPUTERS 5\*, INC., D/B/A LOCALTEL  
341 GRANT RD.  
EAST WENATCHEE WA 98802

PAUL MASTERS  
ERNEST COMMUNICATIONS, INC.  
5275 Triangle Pkwy, STE 150  
NORCROSS GA 30092-6511

FELICIA MAYO  
POINT OF CONTACT  
COMM SOUTH COMPANIES, INC.  
REGULATORY AFFAIRS  
8035 EAST R.L. THORNTON FREEWAY, STE 410  
DALLAS TX 75228

DANIEL MELDAZIS  
SENIOR MANAGER REGULATORY AFFAIRS  
FOCAL COMMUNICATIONS CORPORATION  
OF WASHINGTON  
200 NORTH LASALLE ST., STE 1100  
CHICAGO IL 60601

ANDREW METCALFE  
PRESIDENT  
NORTHWEST TELEPHONE, INC.  
1630 N. WENATCHEE AVE., STE 9  
WENATCHEE WA 98801

JILL MOUNSEY  
DIRECTOR-EXTERNAL AFFAIRS  
AT&T WIRELESS SERVICES, INC.  
7277 164TH AVE. NE  
REDMOND WA 98052

CARL NICKENS  
SR. COUNSEL  
PACIFIC BELL WIRELESS NORTHWEST, LLC  
5565 GLENRIDGE CONNECTOR, STE 1700  
ATLANTA GA 30346

JON PESNELL  
CONTROLLER  
PREFERRED CARRIER SERVICES, INC. (T953)  
14681 MIDWAY ROAD, STE 105  
ADDISON TX 75001

JILL SANFORD  
SENIOR ATTORNEY  
ABOVENET COMMUNICATIONS, INC  
360 HAMILTON AVENUE  
WHITE PLAINS NY 10601

TIMOTHY M SEAT  
Z-TEL COMMUNICATIONS, INC.  
601 S. HARBOUR ISLAND BLVD, STE 220  
TAMPA FL 33602

BOB MCCOY  
GENERAL COUNSEL  
WILLIAMS LOCAL NETWORK, INC.  
4100 ONE WILLIAMS CENTER  
TULSA OK 74172

BECKI MERKEL  
COST ACCOUNTANT II  
MCLEODUSA TELECOMMUNICATIONS SVCS.  
6400 C ST., SW  
P.O. BOX 3177  
CEDAR RAPIDS IA 52405-3177

NICOLE MIZELL  
REGULATORY SPECIALIST  
VARTEC TELECOM, INC.  
1600 VICEROY DRIVE  
DALLAS TX 75235

CATHERINE MURRAY  
MANAGER, REGULATORY AFFAIRS  
ESCHELON TELECOM OF WASHINGTON, INC.  
730 SECOND AVENUE SOUTH, STE 1200  
MINNEAPOLIS MN 55402

WILLIAM OBERLIN  
BULLSEYE TELECOM, INC.  
25900 GREENFIELD ROAD, STE 330  
OAK PARK MI 48237

DAVID M PIKOFF  
VICE PRESIDENT  
DPI-TELECONNECT, L.L.C.  
2997 LBJ FREEWAY, STE 225  
DALLAS TX 75234

THOMAS SAWATZKI  
HIGHSPEED.COM LLC  
6W ROSE ST.  
STE 500  
WALLA WALLA WA 99362

MICHEL SINGER NELSON  
ATTORNEY  
WORLD.COM, INC.  
707 17TH ST., STE 4200  
DENVER CO 80202

DAVID L STARR  
DIRECTOR, REGULATORY COMPLIANCE  
ALLEGIANCE TELECOM OF WASHINGTON, INC.  
9201 NORTH CENTRAL EXPRESSWAY  
DALLAS TX 75231

RICHARD STEVENS  
PRESIDENT  
CENTEL COMMUNICATIONS, INC.  
PO BOX 25  
GOLDENDALE WA 98620-0025

MARY TAYLOR  
REGULATORY MANAGER  
AT&T COMMUNICATIONS OF THE  
PACIFIC NORTHWEST  
2120 CATON WAY SW, STE B  
OLYMPIA WA 98502

BRIAN THOMAS  
TIME WARNER TELECOM OF WASHINGTON LLC  
223 TAYLOR AVENUE N.  
SEATTLE WA 98109

ROWENA VALLE  
NOS COMMUNICATIONS, INC. (T1022)  
TARIFF AND REGULATORY AFFAIRS  
4380 BOULDER HIGHWAY  
LAS VEGAS NV 89121-3002

SULTAN WEATHERSPOON  
WEATHERSPOON TELEPHONE, LLC  
16410 NE 32ND STREET  
VANCOUVER WA 98682

RICK WEAVER  
REGULATORY CONTACT  
WESTGATE COMMUNICATIONS, LLC  
PO BOX 1903  
BREWSTER WA 98812

SIMON FFITCH  
OFFICE OF THE ATTORNEY GENERAL  
PUBLIC COUNSEL  
900 4TH AVENUE STE 2000  
SEATTLE WA 98164

TERESA S REFF  
SENIOR FINANCIAL ANALYST  
GLOBAL CROSSING LOCAL SERVICES, INC.  
REGULATORY AFFAIRS  
1080 PITTSFORD VICTOR ROAD  
PITTSFORD NY 14534

LANCE TADE  
ELECTRIC LIGHTWAVE, INC  
4 TRIAD CENTER, STE 200  
SALT LAKE CITY UT 84180

MARY TAYLOR  
TCG SEATTLE  
2120 CATON WAY SW, STE 3  
OLYMPIA WA 98502

DUDLEY UPTON  
CELLCO PARTNERSHIP  
1300 I ST. NW, STE 400  
WASHINGTON DC 20005

RANDALL C MEACHAM  
SENIOR MANAGER - GOVERNMENT AFFAIRS  
KMC TELECOM V, INC.  
1755 N. BROWN ROAD  
LAWRENCEVILLE GA 30043

RHONDA WEAVER  
DIRECTOR OF GOVERNMENT AFFAIRS &  
TELEPHONE  
COMCAST PHONE OF WASHINGTON, LLC  
440 YAUGER WAY SW  
OLYMPIA WA 98502-8153

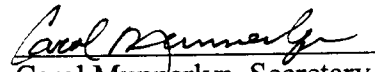
KAREN SHORESMAN FRAME  
COVAD COMMUNICATIONS COMPANY  
7901 LOWRY BLVD.  
DENVER CO 80320

EDWARD KIRSCH  
SWIDLER BERLIN SHEREFF FRIEDMAN LLP  
300 K STREET NW  
STE 300  
WASHINGTON DC 20007-5116

Genny Morelli  
KELLEY DRYE & WARREN, LLP  
1200 19TH STREET, NW  
STE 500  
WASHINGTON DC 20036

RICHARD A PITT  
Representing Northwest Telephone, Inc.  
12119 JACQUELINE DRIVE  
P.O. BOX 667  
BURLINGTON WA 98233

DATED at Seattle, Washington this 30<sup>th</sup> day of December, 2004.

  
\_\_\_\_\_  
Carol Mungerlyn, Secretary