



600 University Street, Suite 3600
Seattle, Washington 98101
main 206.624.0900
fax 206.386.7500
www.stoel.com

January 19, 2005

TIMOTHY J. O'CONNELL
Direct (206) 386-7562
tjoconnell@stoel.com

OVERNIGHT
VIA E-MAIL AND ~~HAND~~ DELIVERY

Ms. Carole Washburn, Executive Secretary
Washington Utilities & Transportation Committee
1300 Evergreen Park Drive, SW
Olympia, WA 98504

Re: Docket No. UT-043013 –

Dear Ms. Washburn:

Enclosed for filing please find original and six copies of the Joint Statement of the Issues in this docket. With one exception, the parties have authorized me to state that this is a joint issues list, agreed to by all parties.

Sprint agrees with all issues except for Issue No. 20. Sprint contends that there are two additional sub-issues that should be identified there. Mr. Hendricks will forward those sub-issues on behalf of Sprint.

Please do not hesitate to call if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "T. J. O'Connell", written over a horizontal line.

Timothy J. O'Connell

Enclosure

cc: ALJ Ann Rendahl
Parties of Record

1 **BEFORE THE**

2 **WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

3 In the Matter of the Petition for
4 Arbitration of an Amendment for
Interconnection Agreements of

5 VERIZON NORTHWEST INC.

6 with

7 COMPETITIVE LOCAL EXCHANGE
8 CARRIERS AND COMMERCIAL
9 MOBILE RADIO SERVICE
10 PROVIDERS IN WASHINGTON

11 Pursuant to 47 U.S.C. Section 252(b),
12 And the *Triennial Review Order*

Docket No. UT-043013

**JOINT STATEMENT OF THE
ISSUES**

13 As required by Order No. 14, all parties agree that the following issues are appropriate for
14 resolution in this proceeding.

15 ISSUES

- 16
- 17 1. Should the Amendment include rates, terms, and conditions that do not arise from federal
18 unbundling regulations pursuant to 47 U.S.C. sections 251 and 252, including issues
asserted to arise under state law?
 - 19 2. What terms and conditions and/or rates regarding implementing changes in unbundling
20 obligations or changes of law should be included in the Amendment to the parties'
interconnection agreements?
 - 21 3. What obligations, if any, with respect to unbundled access to local circuit switching,
22 including mass market and enterprise switching (including Four-Line Carve-Out
switching), and tandem switching, should be included in the Amendment to the parties'
23 interconnection agreements?
 - 24 4. What obligations, if any, with respect to unbundled access to DS1 loops, DS3 loops and
25 dark fiber loops should be included in the Amendment to the parties' interconnection
agreements?
- 26

JOINT STATEMENT OF
THE ISSUES - 1

- 1 5. What obligations, if any, with respect to unbundled access to dedicated transport,
2 including dark fiber transport, should be included in the Amendment to the parties'
interconnection agreements?
- 3 6. Under what conditions, if any, is Verizon permitted to re-price existing arrangements
4 which are no longer subject to unbundling under federal law?
- 5 7. Should Verizon be permitted to provide notice of discontinuance in advance of the
6 effective date of removal of unbundling requirements? Should the Amendment state that
7 Verizon's obligations to provide notification of discontinuance have been satisfied.
- 8 8. Should Verizon be permitted to assess non-recurring charges when it changes a UNE
9 arrangement to an alternative service? If so, what charges apply?
- 10 9. What terms should be included in the Amendments' Definitions Section and how should
11 those terms be defined?
- 12 10. Should Verizon be required to follow the change of law and/or dispute resolution
13 provisions in existing interconnection agreements if it seeks to discontinue the
14 provisioning of UNEs under federal law? Should the establishment of UNE rates, terms
15 and conditions for new UNEs, UNE combinations or commingling be subject to the
16 change of law provisions of the parties' interconnection agreements?
- 17 11. How should any rate increases and new charges established by the FCC in its final
18 unbundling rules or elsewhere be implemented?
- 19 12. Should the interconnection agreements be amended to address changes arising from the
20 TRO with respect to commingling of UNEs with wholesale services, EELs, and other
21 combinations? If so, how?
- 22 13. Should the interconnection agreements be amended to address changes arising from the
23 TRO with respect to conversion of wholesale services to UNEs/UNE combinations? If so,
24 how?
- 25 14. Should the ICAs be amended to address changes, if any, arising from the TRO with
26 respect to:
- a) Line splitting;
 - b) Newly built FTTP, FTTH or FTTC loops;
 - c) Overbuilt FTTP, FTTH or FTTC loops;
 - d) Access to hybrid loops for the provision of broadband services;
 - e) Access to hybrid loops for the provision of narrowband services;
 - f) Retirement of copper loops;
 - g) Line conditioning;
 - h) Packet switching;
 - i) Network Interface Devices (NIDs);
 - j) Line sharing?
- If so how?
15. What should be the effective date of the Amendment to the parties' agreements?

JOINT STATEMENT OF
THE ISSUES - 2

1
2 16. How should CLEC requests to provide narrowband services through unbundled access to a
3 loop where the end user is served via Integrated Digital Loop Carrier (IDLC) be
4 implemented?

5 17. Should Verizon be subject to standard provisioning intervals or performance
6 measurements and potential remedy payments, if any, in the underlying Agreement or
7 elsewhere, in connection with its provision of

- 8 a) unbundled loops in response to CLEC requests for access to IDLC-served hybrid
9 loops;
10 b) Commingled arrangements;
11 c) Conversion of access circuits to UNEs;
12 d) Loops or Transport (including Dark Fiber Transport and Loops) for which Routine
13 Network Modifications are required;

14 **[Verizon objects to sub-issue (e), below, and states that it falls outside the scope of
15 this proceeding and is not appropriate for resolution in this proceeding.]**

16 e) batch hot cut, large job hot cut and individual hot cut processes?

17 18. How should sub-loop access be provided under the TRO?

18 19. Where Verizon collocates local circuit switching equipment (as defined by the FCC's
19 rules) in a CLEC facility/premises (i.e. reverse collocation), should the transmission path
20 between that equipment and the Verizon serving wire center be treated as unbundled
21 transport? If so, what revisions to the parties' agreements are needed?

22 20. Are interconnection trunks between a Verizon wire center and a CLEC wire center,
23 interconnection facilities under section 251(c)(2) that must be provided at TELRIC?

24 21. What obligations, if any, with respect to EELs should be included in the Amendment to
25 the parties' interconnection agreements?

26 a) What information should a CLEC be required to provide to Verizon as certification to
satisfy the FCC's service eligibility criteria to (1) convert existing circuits/services to
EELs or (2) order new EELs?

b) Conversion of existing circuits/services to EELs:

(1) Should Verizon be prohibited from physically disconnecting, separating or
physically altering the existing facilities when a CLEC requests a conversion of
existing circuits/services to an EEL unless the CLEC requests such facilities
alteration?

(2) What type of charges, if any, and under what conditions, if any, can Verizon
impose when CLECs convert existing access circuits/services to UNE loop and
transport combinations?

(3) Should EELs ordered by a CLEC prior to October 2, 2003, be required to meet the
FCC's service eligibility criteria?

JOINT STATEMENT OF
THE ISSUES - 3

1
2 (4) For conversion requests submitted by a CLEC prior to the effective date of the
3 amendment, should CLECs be entitled to EELs/UNE pricing effective as of the
4 date the CLEC submitted the request (but not earlier than October 2, 2003)?

5 c) What are Verizon's rights to obtain audits of CLEC compliance with the FCC's service
6 eligibility criteria?

7 22. How should the Amendment reflect an obligation that Verizon perform routine network
8 modifications necessary to permit access to loops, dedicated transport, or dark fiber
9 transport facilities where Verizon is required to provide unbundled access to those
10 facilities under 47 U.S.C. § 251(c)(3) and 47 C.F.R. Part 51?

11 23. Should the parties retain their pre-Amendment rights arising under the Agreement, tariffs,
12 and SGATs?

13 24. Should the Amendment set forth a process to address the potential effect on the CLECs'
14 customers' services when a UNE is discontinued?

15 25. How should the Amendment implement the FCC's service eligibility criteria for
16 combinations and commingled facilities and services that may be required under 47 U.S.C.
17 § 251(c)(3) and 47 C.F.R. Part 51?

18 26. Should the Amendment reference or address commercial agreements that may be
19 negotiated for services or facilities to which Verizon is not required to provide access as a
20 Section 251 UNE?

21 27. Should Verizon provide an access point for CLECs to engage in testing, maintaining and
22 repairing copper loops and copper subloops?

23 28. What transitional provisions should apply in the event that Verizon no longer has a legal
24 obligation to provide a UNE? How should the Amendment address Verizon's obligations
25 to provide UNEs in the absence of the FCC's permanent rules? Does Section 252 of the
26 1996 Act apply to replacement arrangements?

27 29. Should Verizon be required to negotiate terms for service substitutions for UNEs that
28 Verizon no longer is required to make available under section 251 of the Act?

29 30. Should the FCC's permanent unbundling rules apply and govern the parties' relationship
30 when issued, or should the parties not become bound by the FCC order issuing the rules
31 until such time as the parties negotiate an amendment to the ICA to implement them, or
32 Verizon issues a tariff in accordance with them.

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JOINT STATEMENT OF
THE ISSUES - 4

1 31. Do Verizon's obligations to provide UNEs at TELRIC rates under applicable law differ
2 depending upon whether such UNE's are used to serve the existing customer base or new
customers? If so, how should the Amendment reflect that difference?

3
4 January 19, 2005

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CERTIFICATE OF SERVICE

I hereby certify that I have this 19th day of January, 2005, served the true and correct original, along with the correct number of copies, of *Joint Statement of Issues* and *Certificate of Service* upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn, Executive Secretary
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98503-7250

Hand Delivered
 U.S. Mail (1st class, postage prepaid)
 Overnight Mail
 Facsimile (360) 586-1150
 Email (records@wutc.wa.gov)

I hereby certify that I have this 19th day of January, 2005, served a true and correct copies of the foregoing documents upon parties noted below via e-mail and will mail copies via U.S. Mail on January 20, 2005 to:

The Honorable Ann E. Rendahl
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Dr SW
Olympia, WA 98504-7250
Email: arendahl@wutc.wa.gov

Brooks E. Harlow
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352
Email: brooks.harlow@millernash.com

Edward W. Kirsch
Jon Frankel
Russell Blau
Swidler Berlin Shereff Friedman LLP
300 K Street NW, Suite 300
Washington, DC 20007-5116
Email: ewkirsch@swidlaw.com
Email: jsfrankel@swidlaw.com
Email: mblau@swidlaw.com

Heather T. Hendrickson
Andrew Klein
Genevieve Morelli
Kelley Drye & Warren LLP
1200 19th Street, N.W., Suite 500
Washington, DC 20036
Email: hhendrickson@kelleydrye.com
Email: aklein@kelleydrye.com
Email: gmorelli@kelleydrye.com

Letty Friesen
AT&T Communications
1875 Lawrence Street, Suite 1500
Denver, CO 80202
Email: lfriesen@lga.att.com

Richard A. Pitt
12119 Jacqueline Drive
P. O. Box 667
Burlington, WA 98233
Email: rapitt98232@msn.com

Tre E. Hendricks III
United Telephone Co. of the NW
902 Wasco Street
Hood River, OR 97031-3105
Email: tre.e.hendricks.iii@mail.sprint.com

Paul Masters
Ernest Communications Inc.
5275 Triangle Parkway, Suite 150
Norcross, GA 30092-6511
Email: pmasters@ernestgroup.com

Karen Shoresman Frame
Covad Communications Co.
7901 Lowry Boulevard
Denver, CO 80230
Email: kframe@covad.com

Michel L. Singer Nelson
Worldcom, Inc.
707 17th Street, Suite 4200
Denver, CO 80202-3432
Email: michel.singer_nelson@mci.com

Mark P. Trincherro
Davis Wright Tremaine
1300 SW Fifth Avenue, Suite 2300
Portland, WA 97201
Email: marktrincherro@dwt.com

Roy Harsila
Carrier Relations Manager
Comm South Companies Inc.
6830 Walling Lane
Dallas, TX 75231
Email: rharsila@commsouth.net

Lisa F. Rackner
Ater Wynne LLP
222 SW Columbia, Suite 1899
Portland, OR 97202
Email: lfr@aterwynne.com

William E. Braun, V.P. and General Counsel
Dennis Kelley, Director of Operations
(Provisioning)
1-800-RECONEX INC.
2500 Industrial Avenue
Hubbard, OR 97032
Email: bill.braun@reconex.com
Email: dennis.kelley@reconex.com

Barbara Fillinger
Regulatory Manager
Ionex Communication North, Inc.
2020 Baltimore
Kansas City, MO 64108
E-mail: bfillinger@birch.com

Karine Hellwig
Sprint Communications Company L.P.
6390 Spring Pkwy
Ms: KSOPHT010-Z2400
Overland Park, KS 66251-2400
E-mail: glenn.harris@mail.sprint.com

Gregory J. Kopta
Davis Wright Tremaine LLP
1501 Fourth Avenue, Suite 2600
Seattle, WA 98101-1688
Email: gregkopta@dwt.com

Richard A. Finnigan
2405 Evergreen Park Drive SW, Suite B-1
Olympia, WA 98502
Email: rickfinn@ywave.com

Hong N. Huynh
Miller Nash LLP
111 SW Fifth Avenue, Suite 3400
Portland, OR 97204
Email: hong.huynh@millernash.com

Sam Vogel
CMO & SVP Interconnection
Metropolitan Telecomm. of Washington Inc.
44 Wall Street, 6th Floor
New York, NY 10005
Email: svogel@mettel.net

Brian Bolinger
dPi Teleconnect LLC
2997 LBJ Freeway
Dallas, TX 75234
Email: bbolinger@dpitelconnect.com

Michael E. Daughtry
United Communications, Inc., d/b/a Unico
389 SW Scalehouse Court
Bend, OR 97702
E-mail: mike@ucinet.com

Rowena Hardin
Nos Communications, Inc.
Tariff and Regulatory Affairs
4380 Boulder Highway
Las Vegas, NV 89121-3002
E-mail: hardin@nos.com

Schula Hobbs, Director of Regulatory Affairs
DSLNet Communications, LLC
545 Long Wharf Drive, Floor 5
New Haven, CT 06511
E-mail: wbluemling@dsl.net

William P. Hunt, III, V.P., Public Policy
Level 3 Communications, LLC
1025 El Dorado Blvd.
Broomfield, CO 80021
E-mail: bill.hunt@level3.com

Bernard Chao
Covad Communications Company
110 Rio Robles
San Jose, CA 95134-1813
E-mail: bchao@covad.com

Arthur L. Magee, Comptroller
Budget Phone, Inc.
PO Box 19360
Shreveport, LA 71149
E-mail: amagee@budgetphone.com

Sam G. Maropis
Associate Director – Regulatory
SBC Telecom, Inc.
Regulatory/Municipal Affairs
1010 N. St. Mary's, Room 13K
San Antonio, TX 78215
E-mail: sm3745@SBC.com

Daniel Meldazis
Senior Manager Regulatory Affairs
Focal Communications Corporation of Wash
200 North Lasalle Street, Suite 1100
Chicago, IL 60601
E-mail: dmeldazis@focal.com

Andrew Metcalfe, President
Northwest Telephone, Inc.
1630 N. Wenatchee Avenue, Suite 9
Wenatchee, WA 98801
E-mail: metcalfe@nwi.net

William Oberlin
Bullseye Telecom, Inc.
25900 Greenfield Road, Suite 330
Oak Park, MI 48237
E-mail: sloney@bullseyetelecom.com

Heather Qualey
Director Of Product Marketing, Telephony
Metstream Communications, Inc.
1815 NW 169th Place, Suite 4060
Beaverton, OR 97006
E-mail: heather_qualey@metstream.com

Karen Johnson
Corporate Regulatory Attorney
Integra Telecom of Washington, Inc.
1201 NE Loyd Blvd., Suite 500
Portland, OR 97232
E-mail: karen.johnson@integratelecom.com

Joanne Lyons, Director of Accounting
ICG Telecom Group, Inc.
Government and External Affairs
161 Inverness Drive West
Englewood, CO 80112
E-mail: donna-mozina@cgcomm.com

Dimitri Mandelis, President
Computers 5*, Inc., d/b/a Localtel
341 Grant Road
East Wenatchee, WA 98802
E-mail: dimitri@clandt.com

Randall C. Meacham
Senior Manager – Government Affairs
KMC Telecom V, Inc.
1755 N. Brown Road
Lawrenceville, GA 30043
E-mail: rmeach@kmctelecom.com

Becki Merkel, Cost Accountant II
McLeodUSA Telecommunications Services
6400 C Street SW
PO Box 3177
Cedar Rapids, IA 52405-3177
E-mail: bmerkel@mcleodusa.com

Nicole Mizell, Regulatory Specialist
Vartec Telecom, Inc.
1600 Viceroy Drive
Dallas, TX 75235
E-mail: nymizell@vartec.net

Jon Pesnell, Controller
Preferred Carrier Services, Inc. (T953)
14681 Midway Road, Suite 105
Addison, TX 75001
E-mail: alex.valencia@phonesforall.com

Teresa S. Reff, Senior Financial Analyst
Global Crossing Local Services, Inc.
Regulatory Affairs
1080 Pittsford Victor Road
Pittsford, NY 14534
E-mail: teresa.reff@globalcrossing.com

Jill Sanford, Senior Attorney
Robert Sokota, General Counsel
Abovenet Communications, Inc.
360 Hamilton Avenue
White Plains, NY 10601
E-mail: knations@mmfn.com

David L. Starr
Director, Regulatory Compliance
Allegiance Telecom of Washington, Inc.
9201 North Central Expressway
Dallas, TX 75231
E-mail: david.starr@algx.com

Dick Van Aggelen
Quantumshift Communications, Inc.
101 Rowland Way, Suite 300
Novato, CA 94945
Email: regulatory@quantumshift.com

Rhonda Weaver
Director of Government Affairs & Telephone
Comcast Phone of Washington, LLC
440 Yauger Way SW
Olympia, WA 98502-8153
Email: rhonda_weaver@cable.comcast.com

Sally Johnston, Assistant Attorney General
Attorney General Office
Representing WUTC
State Mail Stop 40128
Email: ajohnston@wutc.wa.gov

Marathon Communications, Inc.
1550 N. 34th Street, #200
Seattle, WA 98109-2904
E-mail: ageorge@marathon.net

Tax Department
International Telcom, Ltd.
417 2nd Avenue West
Seattle, WA 98119
E-mail: yvette@ms.kallback.com

Penny H. Bewick
New Edge Network, Inc.
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661
E-mail: pbewick@newedgenetworks.com

Timothy M. Seat
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd., Suite 220
Tampa, FL 33602
E-mail: tseat@z-tel.com

Ladonna Truelock
DMJ Communications, Inc.
2525 N. Grandview, Suite 900
Odessa, TX 79761
Email: ltruelock@palomanet.net

Sultan Weatherspoon
Weatherspoon Telephone, LLC
16410 NE 32nd Street
Vancouver, WA 98682
Email: sultan@wttel.com

Arthur Butler
Ater Wynne LLP
Representing Us Cellular
601 Union Street, Suite 5450
Seattle, WA 98101-2327
Email: aab@aterwynne.com

Simon Ffitch
Office of the Attorney General
Public Counsel
Representing Public Counsel
900 4th Avenue, Suite 2000
Seattle, WA 98164
Email: simonff@atg.wa.gov

President
Tel West Communications, LLC
3701 S. Norfolk Street, Suite 300
Seattle, WA 98118
E-mail: dtaylor@telwestservices.com

John P. Andrist, President
NCI Data.Com, Inc.
700 B Okoma Drive
Omak, WA 98841
E-mail: jandrist@ncidata.com

Lon E. Blake
Director of Regulatory Affairs
Advanced Telcom, Inc.
3723 Fairview Industrial Dr. SE
Salem, OR 97302
E-mail: lblake@atgi.net

Michael J. Bradshaw
Powertelnet Communications, Inc.
Po Box 1150
Prosser, WA 99350
E-mail: asstmanager@bentonrea.org

Chris Crowe
Pac-West Telecomm, Inc.
1776 March Lane, Suite 250
Stockton, CA 95207
E-mail: ccrowe@pacwest.com

Dudley Upton
Cellco Partnership
1300 I Street, NW, Suite 400W
Washington, DC 20005

Richard Stevens
President
Centel Communications Inc.
P.O. Box 25
Goldendale, WA 98620

Deanne Laidler
US Cellular
8410 W. Bryn Mawr, Suite 700
Chicago, IL 60631

Thomas Sawatzki
HighSpeed.Com LLC
6 W. Rose Street, Suite 500
Walla Walla, WA 99362

John B. Glicksman
Vice President, General Counsel
Adelphia Business Solutions
1 North Main Street
Coudersport, PA 16915

Ken Goldstein
Metrocall Inc.
6677 Richmond Highway
Alexandria, VA 22306

Steven C. Clay, President
New Access Communications, Llc
801 Nicollet Mall, Suite 350
Minneapolis, MN 55042
E-mail: sclay@newaccess.com

Kimberley A. Bradley
Senior Director of Regulatory Affairs
Winstar Communications, LLC
1850 M Street, N.W., Suite 300
Washington, DC 20036
E-mail: info@winstar.com

Jill Mounsey
Director - External Affairs
AT&T Wireless Services Inc.
7277 164th Avenue NE
Redmond, WA 98052

Tom Cook
Cook Telecom Inc.
2963 Kerner Blvd.
San Rafael, CA 94901

Robert E. Heath, Vice President
American Fiber Network Inc.
9401 Indian Creek Parkway, Suite 140
Overland Park, KS 66210

Rudolph J. Geist
Executive Vice President
O 1 Communications of Washington, LLC
770 L Street, Suite 960
Sacramento, CA 95814

Becky Gipson, Director
Excel Telecommunications, Inc
Regulatory Affairs Department
1600 Viceroy Drive
Dallas, TX 75235

Rick Weaver, Regulatory Contact
Westgate Communications, LLC
Po Box 1903
Brewster, WA 98812

Robert T. Hale, President/CEO
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 02169

Mary Taylor
TCG Seattle
AT&T Communications of the Pac. NW
2120 Caton Way SW, Suite 3
Olympia, WA 98502

Woody Traylor
Broadband Office Communications, Inc.
2900 Telestar Cr.
Falls Church, VA 22182

John Coonan
Washington RSA No. 8 Limited Partnership
C/O Inland Cellular Telephone Company
PO Box 171
Rosland, WA 98941

General Counsel
T-Mobile USA Inc.
12990 SE 38th Street
Bellevue, WA 98006

Irina Armstrong, Regulatory Contact
Metropolitan Telecomm. of Washington
44 Wall Street, Floor 14
New York, NY 10005

Robert Benson, Tariff Support
Fox Communications Corp.
5210 Carillon Point
Kirkland, WA 98033

Dale Crouse, President
Premiere Communications Systems, Inc.
4509 Interlake Ave. N, #110
Seattle, WA 98103

Lance Tade
Electric Lightwave, Inc.
4 Triad Center, Suite 200
Salt Lake City, UT 84180

Brian Thomas
Time Warner Telecom of Washington LLC
223 Taylor Avenue N.
Seattle, WA 98109

Eleanor Spillman
Vice President Operations / Corp. Counsel
Gold Tel
16212 Bothell Way SE, #F-107
Mill Creek, WA 98012

Felicia Mayo, Point Of Contact
Comm South Companies, Inc.
Regulatory Affairs
8035 East R.L. Thornton Freeway, Suite 410
Dallas, TX 75228

Carl Nickens, Sr. Counsel
Pacific Bell Wireless Northwest, LLC
5565 Glenridge Connector, Suite 1700
Atlanta, GA 30346

David M. Pikoff, Vice President
DPI-Teleconnect, L.L.C.
2997 LBJ Freeway, Ste 225
Dallas, TX 75234

Rebecca McGrew, Point of Contact
Ciera Network Systems, Inc.
1250 Wood Branch Park Drive, Suite 600
Houston, TX 77079

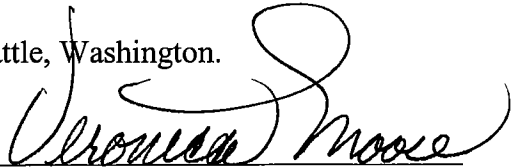
Bob McCoy, General Counsel
Williams Local Network, Inc.
4100 One Williams Center
Tulsa, OK 74172

Rex Knowles
XO Washington, Inc.
1111 East Broadway
Salt Lake City, UT 84111

Catherine Murray
Manager, Regulatory Affairs
Eschelon Telecom Of Washington, Inc.
730 Second Avenue South, Suite 900
Minneapolis, MN 55402-2489

I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

DATED this 19th day of January, 2005, at Seattle, Washington.


Veronica Moore