

1                     **BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION**  
2   **COMMISSION**

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4 FOCAL COMMUNICATIONS                     )  
5 CORPORATION OF WASHINGTON             )       DOCKET NO. UT-013019  
6   )  
7                     Petitioner,                     )       MOTION OF VERIZON  
8   )       NORTHWEST INC. FOR LEAVE  
9 v.   )       TO FILE A REPLY TO  
10   )       THE ANSWER OF FOCAL  
11   )       COMMUNICATIONS  
12   )       CORPORATION OF  
13   )       WASHINGTON TO  
14 VERIZON NORTHWEST, INC.,             )       VERIZON NORTHWEST’S  
15   )       PETITION FOR  
16                     Respondent.                     )       ADMINISTRATIVE REVIEW  
17   )  
18 -----

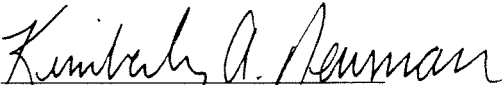
19             Verizon Northwest Inc. (“Verizon Northwest”), by its undersigned attorneys,  
20 hereby submits this Motion to file a Reply to the Answer of Focal Communications  
21 Corporation of Washington (“Focal”) to Verizon Northwest’s Petition for Administrative  
22 Review. In its Answer, Focal continues to misstate both the law and the facts relevant to  
23 this proceeding. For example, Focal misstates the precedential value of the *Mattey*  
24 opinion letter. It simply does not control this case. Likewise, and contrary to Focal’s  
25 assertions, Verizon Northwest has not made “gratuitous and incorrect statements”  
26 regarding the parties’ prior compensation arrangements for Internet-bound traffic. On the  
27 contrary, Focal has never had the right to receive reciprocal compensation for such traffic  
28 under any agreement with Verizon Northwest. Finally, Focal continues to misrepresent  
29 the FCC’s ruling in the *Remand Order*.

1           In view of Focal's misleading representations, Verizon Northwest would be  
2 prejudiced without an opportunity to set the record straight. Verizon Northwest  
3 accordingly attaches its Reply to Focal's Answer and requests that the Commission deem  
4 it filed contemporaneously with this Motion.

5           DATED this 30<sup>th</sup> day of November, 2001.

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Respectfully submitted,  
**Verizon Northwest Inc.**  
By Its Attorneys

  
Kimberly A. Newman  
Thomas M. Finan  
Hunton & Williams  
1900 K Street, N.W.  
Washington, DC 20006  
(202) 955-1500

**CERTIFICATE OF SERVICE**

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I hereby certify that I have served Verizon Northwest's Motion for Leave to File a Reply upon Ms. Carole J. Washburn, Washington Utilities & Transportation Commission, 1300 S. Evergreen Park Drive SW, Olympia, WA 98504-7250 and Gregory J. Kopta, Davis Wright Tremaine LLP, 2600 Century Square, 1501 Fourth Avenue, Seattle, WA 98101-1688, via overnight delivery and electronic mail on November 30th, 2001.

*Kimberly A. Neuman*