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September 19, 2002

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STATE OF WASH.  
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COMMISSION

**VIA FACSIMILE AND U.S. MAIL**

Carole J. Washburn, Executive Secretary  
Washington Utilities & Transportation Commission  
P. O. Box 47250  
Olympia, WA 98540-7250

**Re: Docket No. UT-020667  
Verizon's Recommendations for Appropriate Procedure**

Dear Ms. Washburn:

As indicated at the July 19, 2002 Pre-Hearing Conference, this firm represents Verizon Northwest, Inc. in this matter. Paragraph 33 of the Order Declining to Enter Declaratory Order called for parties to submit recommendations to you as to an appropriate procedure to be used to address the issues raised in the underlying Petition for Declaratory Order. Please consider this letter the response on behalf of Verizon.

We understand that WITA will recommend the initiation of a complaint proceeding by the Commission. Verizon joins in the recommendation that the Commission issue a complaint on its own motion, pursuant to RCW 80.04.110.

A complaint proceeding is the appropriate procedural vehicle because it would permit a full airing of the issues raised by WITA's Petition. As the Order Declining to Enter Declaratory Order acknowledges, those issues "merit the Commission's review." Order, paragraph 20. Verizon respectfully suggests that Level 3 would be an appropriate respondent in such a complaint proceeding, insofar as it has acknowledged an intent to offer the VNXX services. Other parties intending to offer such services may be appropriate additional respondents.

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Thank you for the opportunity to offer these recommendations. We look forward to further proceedings on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Timothy J. O'Connell". The signature is fluid and cursive, with a prominent initial "T" and "J".

Timothy J. O'Connell

cc: Parties of Record