

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T COMMUNICATIONS OF	)	
THE PACIFIC NORTHWEST, INC.	)	
	)	Docket No. UT-020406
Complainant,	)	
	)	AT&T MOTION TO
v.	)	SUPPLEMENT ITS PREFILED
	)	TESTIMONY
VERIZON NORTHWEST INC.,	)	
	)	
Respondent.	)	
_____	)	

AT&T Communications of the Pacific Northwest, Inc. (“AT&T”) hereby moves the Commission for permission to supplement the prefiled testimony it filed in this case to address events occurring after AT&T filed its rebuttal testimony..

**MOTION**

1. AT&T filed direct and rebuttal testimony of Dr. Lee L. Selwyn in support of AT&T’s Complaint that initiated this proceeding. Included in that testimony is an imputation analysis of the intraLATA toll services that Verizon Northwest Inc. (“Verizon”) was offering at the time the testimony was filed and continues to offer today. On or about March 25, 2003, almost two months after AT&T filed Dr. Selwyn’s rebuttal testimony, Verizon filed Advice No. 3076, in which Verizon proposes to offer two bundled packages of services including unlimited, flat-rated intraLATA toll calling.

2. AT&T and WorldCom, Inc. (“WorldCom”) have filed a protest of Advice No. 3076 in Docket No. UT-030395, asserting that Verizon’s proposed new offerings, like its existing intraLATA toll offerings, fail to satisfy the Commission’s imputation

requirements and are otherwise not consistent with applicable law. Filed in support of that protest is an affidavit prepared by Dr. Selwyn in which he undertakes an analysis of Verizon's proposed offerings using the same framework he established in his testimony in this proceeding. A copy of the affidavit (without attachments, which largely duplicate information or documents that have been or will be identified as exhibits in this proceeding) is appended to this Motion.

3. AT&T requests that Dr. Selwyn's affidavit filed in Docket No. UT-030395 be marked as an exhibit and be included as part of the testimony and exhibits of Dr. Selwyn that AT&T has prefiled in this proceeding. The affidavit addresses Verizon intraLATA toll plans that did not exist at the time that Dr. Selwyn prepared his prefiled testimony. Regardless of whether the Commission permits those plans to become effective in Docket No. UT-030395, moreover, the affidavit provides further, and even more timely, evidence of Verizon's efforts to monopolize intraLATA toll markets in Washington on behalf of itself and its affiliates.

### **REQUEST FOR RELIEF**

WHEREFORE, AT&T requests the following relief:

A. An order from the Commission granting AT&T permission to include the Affidavit of Lee L. Selwyn in Docket No. UT-030395 as an exhibit to Dr. Selwyn's testimony in this proceeding; and

B. Such other or further relief as the Commission finds fair, just, reasonable, and sufficient.

DATED this 16th day of April, 2003.

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Pacific Northwest, Inc.

By \_\_\_\_\_  
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