## PETITION FOR WAIVER OF VERIZON NORTHWEST INC.

**EXHIBIT A** 

## Subject: Washington State Collocation Intervals

The purpose of this letter is advise carriers of Verizon's intent to maintain the current collocation provisioning intervals in its Washington State tariff by filing a petition with the Washington Utilities and Transportation Commission (WUTC) to make permanent a waiver of the requirements in Washington Administrative Code (WAC) 480-120-560(2) and (3). Verizon intends to file this petition on or shortly after January 20, 2007.

On January 14, 2004, in Order No. 01, Docket No. UT-031995, the WUTC granted Verizon a waiver of WAC 480-120-560(2) and (3) on a temporary basis as a result of a multi-jurisdictional settlement agreement entered into on August 27, 2003 by Verizon, Sprint, Covad, and AT&T ("Interval Settlement Agreement"). As the WUTC noted, the Interval Settlement Agreement included some intervals that were longer, and others that were shorter, than the intervals in WAC 480-120-560(2) and (3). After due consideration, the Commission found that granting the waiver was "reasonable on a temporary basis until August 26, 2006." August 26, 2006 represented the day after which parties to the Interval Settlement Agreement were no longer prohibited from challenging the intervals included therein. The intervals provided for in the Interval Settlement Agreement are included in Verizon's Washington WN U-20 collocation tariff.

Verizon contacted each of the settlement parties (Sprint, Covad and AT&T) and all were in agreement that the intervals in the Interval Settlement Agreement should continue to apply in Washington State beyond August 26, 2006 as a means of continuing the consistency of collocation implementation across numerous jurisdictions. The collocation intervals from the Interval Settlement Agreement have been used in over twenty-five states for the last three years and have served the telecommunications industry well.

On August 16, 2006, Verizon filed a petition to extend the waiver of WAC 480-120-560(2) and (3) to allow Verizon to continue to apply the implementation intervals for requests for collocation previously approved by the WUTC on January 14, 2004. The petition was assigned Docket No. UT-061330. The WUTC extended the waiver on a temporary basis until March 1, 2007 to allow all carriers to be notified of and to comment on the waiver and Verizon's proposal to make it permanent.

Please submit any comments to Verizon on this Notice to Mr. Richard E. Potter at <a href="richard.potter@verizon.com">richard.potter@verizon.com</a> (or fax to 425-261-5262) by January 15, 2007. You may also provide comments to the Washington Utilities and Transportation Commission by using the contact information below. If you do, please refer to Docket No. UT-061330.

## WUTC contact:

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