

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC.,	)	Docket No. UT-020406
	)	
Complainant,	)	VERIZON NORTHWEST'S RESPONSE TO
	)	AT&T'S MOTION TO SUPPLEMENT ITS
vs.	)	PREFILED TESTIMONY
	)	
VERIZON NORTHWEST INC.,	)	
	)	
Respondent.	)	
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The Commission should deny AT&T's Motion to Supplement Its Prefiled Testimony. AT&T seeks to expand the issues in this docket to include a recent tariff filing by Verizon Northwest Inc. to introduce new packaged services that include an intraLATA toll component (Docket No. UT-030395). AT&T's Motion is defective in at least three respects.

First, AT&T's proposed additional testimony is not relevant. AT&T's complaint contains no allegations regarding a price squeeze being created by Verizon Northwest's new service offerings, and AT&T does not request leave to amend its complaint to add any such allegations. In fact, any such request would be premature at best, as the Commission has not yet acted on the tariff filing and Verizon Northwest is not, therefore, providing the services at this time. AT&T has submitted a protest to Verizon's advice filing in Docket No. UT-030395. The Commission should address AT&T's concerns in that docket and not allow AT&T to add irrelevant matter to

Docket No. UT-020406. Furthermore, AT&T's proposed additional testimony also relates to Verizon Long Distance, which has never been a party to Docket UT-020406. Because the actions of Verizon Long Distance are not at issue in this docket, AT&T's new testimony is irrelevant.

Second, AT&T's proposed additional testimony is largely cumulative. Much of it merely repeats Dr. Selwyn's testimony already on file in this docket. For example, paragraphs 1-5 state Dr. Selwyn's credentials and summarize one of the Commission's imputation orders. Similarly, paragraphs 12-20 simply repeat AT&T's claims regarding Verizon's price floor for toll services.

Third, the remainder of the proposed additional testimony would cause a delay in the hearing schedule for this docket. For instance, Dr. Selwyn proposes new and additional analyses and arguments to support a higher price floor than the one he has proposed in his already-filed testimony. In addition, Dr. Selwyn assumes that Verizon's proposed local calling plans are based on 300 minutes of use for intrLATA toll.<sup>1</sup> Verizon would need to conduct discovery and be allowed to submit responsive testimony explaining that Dr. Selwyn is wrong on these points. AT&T has presented no compelling reason why this testimony is necessary in its complaint case as opposed to in Docket No. UT-030395 involving the Commission's actual consideration of this proposed new services. In sum, it is too late to allow AT&T to add a completely new set of allegations simply to thwart the introduction of new competitive toll product offerings in Washington State.

DATED this \_\_\_\_\_ day of April, 2003.

Respectfully submitted,

GRAHAM & DUNN PC

By \_\_\_\_\_  
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<sup>1</sup> *Id.* at para. 20.