

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition for
Arbitration of an Amendment for
Interconnection Agreements of

VERIZON NORTHWEST INC.

with

COMPETITIVE LOCAL EXCHANGE
CARRIERS AND COMMERCIAL
MOBILE RADIO SERVICE
PROVIDERS IN WASHINGTON

Pursuant to 47 U.S.C. Section 252(b),
And the *Triennial Review Order*

Docket No. UT-043013

VERIZON'S MOTION FOR
MODIFICATION OF PROCEDURAL
SCHEDULE

1. On July 8, 2005, the Arbitrator handed down her Arbitrator's Report and Decision in this matter, Order No. 17 ("Order No. 17"). In that decision, the Arbitrator recommended resolutions for the numerous issues and subissues presented by Verizon and opposing parties.

2. The Arbitrator also called for any party seeking review of the Arbitrator's rulings to do so by August 8, 2005. Order No. 17, at ¶ 534. Responses to such requests for review are to be filed by August 18, 2005. *Id.*

3. The Arbitrator also required that the parties present a proposed interconnection agreement on August 18, 2005, to incorporate the recommended rulings in her decision. Order No. 17, at ¶ 535. This requirement is the subject of this motion.

4. Verizon appreciates the magnitude of the task undertaken by the Arbitrator in evaluating the multiple parties' voluminous filings to develop rulings on the many issues in this case. While Verizon respects the Arbitrator's work, Verizon plans to seek clarification or review of certain rulings in Order No. 17. Verizon expects that that one or more CLEC parties will do the same.

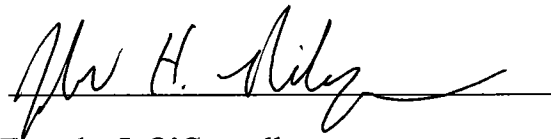
5. In order to negotiate a conforming amendment, Verizon is revising its proposed amendments to incorporate the Arbitrator's rulings. Negotiation of the conforming amendment will obviously be complicated, given the number of parties and issues in this case. In addition, the same set of negotiators for Verizon (and for many of the CLECs) that must negotiate a conforming amendment here must negotiate an amendment conforming to the Massachusetts's commission's TRO arbitration decision issued the week after Order No. 17. Finally, Verizon anticipates that negotiations here will be further complicated by the pendency of divergent requests for review of various aspects of the Arbitrator's decision.

6. Although it is still critical to obtain executed TRO amendments as soon as possible, some modification of the process established in Order No. 17 would more efficiently promote this objective. Specifically, Verizon proposes extending the deadline for a proposed, conforming amendment until after the Commission's ruling on any petitions for review of Order No. 17. In addition to easing resource constraints, this approach should help avoid potential re-negotiation of language relating to rulings that may be modified upon Commission review. Verizon does not propose modifying any other dates prescribed in Order No. 17, so the petitions for review and replies would still be due on August 8 and 18, respectively.

7. Verizon is aware of the Commission's general requirement that continuances will only be granted to a date certain. WAC 480-07-385(4). Therefore, assuming that the

Commission would require about four weeks to consider and rule on any petitions for review, Verizon respectfully requests that finalized interconnection agreements be filed for approval on or about October 8, 2005. This date is approximately 30 days after the anticipated date by which the Commission might rule on petitions for review. If the Commission takes significantly longer to rule on the petitions for review, Verizon is confident that the parties could agree to adjust the due date for the conforming amendment accordingly. Preliminary discussions with some of the parties indicate they are not averse to extending the date for filing the conforming amendment.

Respectfully submitted on July 25, 2005.



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