BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition for)
Arbitration of an Amendment to)
Interconnection Agreements of)
)
VERIZON NORTHWEST, INC.) DOCKET NO. UT- 043013
	,)
with) RESPONSE TO VERIZON'S
) MOTION FOR MODIFICATION
COMPETITIVE LOCAL EXCHANGE) OF PROCEDURAL SCHEDULE
CARRIERS AND COMMERCIAL)
MOBILE RADIO SERVICE PROVIDERS)
IN WASHINGTON)
)
Pursuant to 47 U.S.C. § 252(b), and the)
Triennial Review Order)
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AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle, TCG Oregon (collectively "AT&T") hereby submits this Response to Verizon's Motion for Modification of Procedural Schedule in the above-captioned matter.

- 1. On July 25, 2005, Verizon Northwest, Inc. ("Verizon") filed a Motion for Modification of Procedural Schedule. In that Motion, Verizon moved to extend the date for filing conformed interconnection agreements from August 18, 2005 until after the Commission's ruling on any petitions for review of Order No. 17. Specifically, Verizon requested that conformed interconnection agreements be filed for approval on or about October 8, 2005, which is approximately 30 days after the Commission might rule on any petitions for review filed in August.
- 2. Although Verizon did not contact AT&T prior to filing its Motion for Modification of Procedural Schedule, nonetheless, AT&T supports Verizon's Motion.

AT&T agrees that negotiation of the conforming amendment is likely to be a complicated and time-intensive process. AT&T also believes that postponing the filing of conformed agreements until after the Commission rules on petitions for review could help avoid renegotiation of language related to rulings that the Commission might modify on review.

3. WHEREFORE, AT&T respectfully requests that the ALJ grant Verizon's request to extend the date for filing conformed agreements until October 8, 2005.

Submitted this 29th day of July, 2005.

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC. AND AT&T LOCAL SERVICES ON BEHALF OF TCG SEATTLE AND TCG OREGON

By:

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CERTIFICATE OF SERVICE

Docket No. UT-043013

I hereby certify that on the date given below the original and 2 copies of AT&T's Response to Verizon's Motion to Modify Schedule were sent by overnight delivery to:

Ms. Carole J. Washburn, Secretary Washington Utilities & Transportation Commission 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250

An electronic copy was also sent to records@wutc.wa.gov.

On the same date, a true and correct copy was sent by electronic mail and/or U.S. Mail to:

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Arthur A. Butler Ater Wynne LLP 601 Union Street, Suite 5450 Seattle, WA 98101-2327 The Honorable Ann Rendahl WUTC 1300 S. Evergreen Park Drive SW Olympia, WA 98504-7250

DATED this 29th day of July, 2005.

Michelle Sloane Bourianoff