



600 University Street, Suite 3600
Seattle, Washington 98101
main 206.624.0900
fax 206.386.7500
www.stoel.com

October 14, 2005

TIMOTHY J. O'CONNELL
Direct (206) 386-7562
tjoconnell@stoel.com

VIA FEDERAL EXPRESS

Ms. Carole Washburn, Executive Secretary
Washington Utilities & Transportation Committee
1300 Evergreen Park Drive, SW
Olympia, WA 98504

Re: Docket No. UT-043013 –

Dear Ms. Washburn:

Please find enclosed an original and six copies of Verizon's Unopposed Motion to Continue Date for Filing of Interconnection Agreement and a Certificate of Service for filing in the above-referenced matter.

Please contact us if you have any questions, and thank you in advance for your assistance.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Veronica Moore', written over a large, stylized initial 'V'.

Veronica Moore
Secretary for Timothy J. O'Connell

Enclosures

cc: ALJ Ann Rendahl
Parties of Record

**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 UNOPPOSED MOTION TO
CONTINUE DATE FOR FILING OF
INTERCONNECTION AGREEMENT

1. Verizon Northwest Inc. ("Verizon") hereby moves that the filing of an interconnection agreement amendment to implement the rulings of the Arbitrator and the Commission, currently required on October 24, 2005, be postponed to December 18, 2005. As set forth below, Verizon believes this motion will be unopposed.
2. Under the schedule established in the Notice of August 3, 2005, Verizon is required to file an amendment to the existing interconnection agreements reflecting the rulings of the Arbitrator and Commission in this proceeding within thirty days after the Commission entered an order on petitions for review. The Commission's final order issued on September 22, 2005. Verizon is therefore currently required to file the implementing amendment on October 24, 2005.
3. As the Commission has been aware, Verizon is involved in similar proceedings in other states. One such jurisdiction is Massachusetts. The Massachusetts proceeding involves almost all of the same parties as are before the Commission here.

4. In the context of that proceeding, the parties have been negotiating to prepare a final TRO/TRRO amendment. Those discussions involve the same personnel who would negotiate an implementing amendment for Washington.

5. The parties believe that additional time is needed to complete the negotiation process. Although the Massachusetts amendment reflects some rulings specific to Massachusetts, the amendment resulting from the Massachusetts negotiations will consist largely of mutually-agreed terms that can be used in the Washington amendment to minimize disputes in the drafting of conforming language for Washington. The parties believe that the process could be completed in an additional three to four weeks.

6. On Friday, October 7, 2005, the undersigned advised all parties to this proceeding that Verizon intended to move the Commission to postpone the filing of the interconnection agreement amendment to December 18, 2005, for the reasons identified above. Several parties have indicated affirmative agreement; no party registered any objection to the revised date.

7. Therefore, Verizon respectfully requests that the filing of an amendment to implement the rulings in this case be postponed to December 18, 2005.

Respectfully submitted on October 14, 2005.

By:



Timothy J. O'Connell
Stoel Rives LLP
600 University Street, Suite 3600
Seattle, WA 98101
206-386-7562
Counsel for Verizon Northwest Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of October, 2005, served the true and correct original, along with the correct number of copies, of *Verizon's Unopposed Motion to Continue Date for Filing of Interconnection Agreement and Certificate of Service* upon the WUTC, via the method(s) noted below, properly addressed as follows:

Carole Washburn, Executive Secretary
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98503-7250

Hand Delivered
 U.S. Mail (1st class, postage prepaid)
 Overnight Mail
 Facsimile (360) 586-1150
 Email (records@wutc.wa.gov)

I hereby certify that I have this 14th day of October, 2005, served a true and correct copies of the foregoing documents upon parties noted below via E-Mail and U.S. Mail:

The Honorable Ann E. Rendahl
Washington Utilities & Transportation
Commission
1300 S. Evergreen Park Dr SW
Olympia, WA 98504-7250
Email: arendahl@wutc.wa.gov

Brooks E. Harlow
David Rice
Miller Nash LLP
4400 Two Union Square
601 Union Street
Seattle, WA 98101-2352
Email: brooks.harlow@millernash.com
Email: david.rice@millernash.com

Edward W. Kirsch
Swidler Berlin Shereff Friedman LLP
300 K Street NW, Suite 300
Washington, DC 20007-5116
Email: ewkirsch@swidlaw.com

Genevieve Morelli
A. Edmonds
Kelley Drye & Warren LLP
1200 19th Street, N.W., Suite 500
Washington, DC 20036
Email: aedmonds@kelleydrye.com
Email: gmorelli@kelleydrye.com

Letty Friesen
Michelle Bourianoff
AT&T Communications
919 Congress Avenue, Suite 900
Austin, TX 78701-2444
Email: lsfriesen@att.com
Email: mbourianoff.com

Gregory J. Kopta
Davis Wright Tremaine LLP
1501 Fourth Avenue, Suite 2600
Seattle, WA 98101-1688
Email: gregkopta@dwt.com

Tre E. Hendricks III
United Telephone Co. of the NW
902 Wasco Street
Hood River, OR 97031-3105
Email: tre.e.hendricks.iii@mail.sprint.com

Michel L. Singer Nelson
Worldcom, Inc.
707 17th Street, Suite 4200
Denver, CO 80202-3432
Email: michel.singer_nelson@mci.com

I hereby certify that I have on the 14th day of October, 2005, served true and correct copies of the foregoing documents upon parties noted below via U.S. Mail.

Gregory Diamond, Senior Counsel
Covad Communications Co.
7901 Lowry Boulevard
Denver, CO 80230
Email: gdiamond@covad.com

Rex Knowles
XO Washington, Inc.
1111 East Broadway
Salt Lake City, UT 84111

Dennis Kelley, Director of Operations
(Provisioning)
1-800-RECONEX INC.
2500 Industrial Avenue
Hubbard, OR 97032
Email: dennis.kelley@reconex.com

Barbara Fillinger
Regulatory Manager
Ionex Communication North, Inc.
2020 Baltimore
Kansas City, MO 64108
E-mail: bfillinger@birch.com

William P. Hunt, III, V.P., Public Policy
Level 3 Communications, LLC
1025 El Dorado Blvd.
Broomfield, CO 80021
E-mail: bill.hunt@level3.com

Schula Hobbs
Director of Regulatory Affairs
DSLNet Communications LLC
545 Long Wharf Drive FL 5
New Haven, CT 06511
E-mail: wbluemling@dsl.net

Arthur L. Magee, Comptroller
Budget Phone, Inc.
PO Box 19360
Shreveport, LA 71149
E-mail: amagee@budgetphone.com

Sam G. Maropis
Associate Director – Regulatory
SBC Telecom, Inc.
Regulatory/Municipal Affairs
1010 N. St. Mary's, Room 13K
San Antonio, TX 78215
E-mail: sm3745@SBC.com

Paul Masters
Ernest Communications Inc.
5275 Triangle Parkway, Suite 150
Norcross, GA 30092-6511
Email: pmasters@ernestgroup.com

Richard A. Finnigan
2405 Evergreen Park Drive SW, Suite B-1
Olympia, WA 98502
Email: rickfinn@ywave.com

Lance Tade
Electric Lightwave, Inc.
4 Triad Center, Suite 200
Salt Lake City, UT 84180

Rowena Hardin
Nos Communications, Inc.
Tariff and Regulatory Affairs
4380 Boulder Highway
Las Vegas, NV 89121-3002
E-mail: hardin@nos.com

Karen Johnson
Corporate Regulatory Attorney
Integra Telecom of Washington, Inc.
1201 NE Loyd Blvd., Suite 500
Portland, OR 97232
E-mail: karen.johnson@integratelecom.com

Joanne Lyons, Director of Accounting
ICG Telecom Group, Inc.
Government and External Affairs
161 Inverness Drive West
Englewood, CO 80112
E-mail: donna-mozina@cgcomm.com

Dimitri Mandelis, President
Computers 5*, Inc., d/b/a Localtel
341 Grant Road
East Wenatchee, WA 98802
E-mail: dimitri@clandt.com

Randall C. Meacham
Senior Manager – Government Affairs
KMC Telecom V, Inc.
1755 N. Brown Road
Lawrenceville, GA 30043
E-mail: rmeach@kmctelecom.com

David M. Pikoff, Vice President
DPI-Teleconnect, L.L.C.
2997 LBJ Freeway, Ste 225
Dallas, TX 75234

Daniel Meldazis
Senior Manager Regulatory Affairs
Focal Communications Corporation of Wash
200 North Lasalle Street, Suite 1100
Chicago, IL 60601
E-mail: dmeldazis@focal.com

Brian Thomas
Time Warner Telecom of Washington LLC
223 Taylor Avenue N.
Seattle, WA 98109

William Oberlin
Bullseye Telecom, Inc.
25900 Greenfield Road, Suite 330
Oak Park, MI 48237
E-mail: sloney@bullseyetelecom.com

John Coonan
Washington RSA No. 8 Ltd. Partnership
C/o Inland Cellular Telephone Company
P. O. Box 171
Rosland, WA 98941

Jill Sanford, Senior Attorney
Robert Sokota, General Counsel
Abovet Communications, Inc.
360 Hamilton Avenue
White Plains, NY 10601
E-mail: knations@mmfn.com

David L. Starr
Director, Regulatory Compliance
Allegiance Telecom of Washington, Inc.
9201 North Central Expressway
Dallas, TX 75231
E-mail: david.starr@algx.com

Felicia Mayo, Point Of Contact
Comm South Companies, Inc.
Regulatory Affairs
8035 East R.L. Thornton Freeway, Suite 410
Dallas, TX 75228

Becki Merkel, Cost Accountant II
McLeodUSA Telecommunications Services
6400 C Street SW
PO Box 3177
Cedar Rapids, IA 52405-3177
E-mail: bmerkel@mcleodusa.com

Sara Howell, Regulatory Analyst II
Vartec Telecom, Inc.
2440 Marsh Lane
Carrollton, TX 75006

Jon Pesnell, Controller
Preferred Carrier Services, Inc. (T953)
14681 Midway Road, Suite 105
Addison, TX 75001
E-mail: alex.valencia@phonesforall.com

Teresa S. Reff, Senior Financial Analyst
Global Crossing Local Services, Inc.
Regulatory Affairs
1080 Pittsford Victor Road
Pittsford, NY 14534
E-mail: teresa.reff@globalcrossing.com

Timothy M. Seat
Z-Tel Communications, Inc.
601 S. Harbour Island Blvd., Suite 220
Tampa, FL 33602
E-mail: tseat@z-tel.com

Karine Hellwig
Sprint Communications Company LP
6390 Spring Parkway
MS: KSOPHT010-z2400
Overland Park, KS 66251-2400
E-mail: glenn.harris@mail.sprint.com

Sultan Weatherspoon
Weatherspoon Telephone, LLC
16410 NE 32nd Street
Vancouver, WA 98682
Email: sultan@wttel.com

Rhonda Weaver
Director of Government Affairs & Telephone
Comcast Phone of Washington, LLC
440 Yauger Way SW
Olympia, WA 98502-8153
Email: rhonda_weaver@cable.comcast.com

Dale Crouse, President
Premiere Communications Systems, Inc.
4509 Interlake Ave. N, #110
Seattle, WA 98103

Marathon Communications, Inc.
1550 N. 34th Street, #200
Seattle, WA 98109-2904
E-mail: ageorge@marathon.net

Tax Department
International Telcom, Ltd.
417 2nd Avenue West
Seattle, WA 98119
E-mail: yvette@ms.kallback.com

Penny H. Bewick
New Edge Network, Inc.
3000 Columbia House Blvd., Suite 106
Vancouver, WA 98661
E-mail: pbewick@newedgenetworks.com

Michael J. Bradshaw
Powertelnet Communications, Inc.
Po Box 1150
Prosser, WA 99350
E-mail: asstmanager@bentonrea.org

Chris Crowe
Pac-West Telecomm, Inc.
1776 March Lane, Suite 250
Stockton, CA 95207
E-mail: ccrowe@pacwest.com

Dudley Upton
Cellco Partnership
1300 I Street, NW, Suite 400W
Washington, DC 20005

Arthur Butler
Ater Wynne LLP
Representing Us Cellular
601 Union Street, Suite 5450
Seattle, WA 98101-2327
Email: aab@aterwynne.com

Simon Ffitch
Office of the Attorney General
Public Counsel
Representing Public Counsel
900 4th Avenue, Suite 2000
Seattle, WA 98164
Email: simonf@atg.wa.gov

Donald Taylor, President
Tel West Communications, LLC
3701 S. Norfolk Street, Suite 300
Seattle, WA 98118
E-mail: dtaylor@telwestservices.com

John P. Andrist, President
NCI Data.Com, Inc.
700 B Okoma Drive
Omak, WA 98841
E-mail: jandrist@ncidata.com

Bob McCoy
General Counsel
Williams Local Network, Inc.
4100 One Williams Center
Tulsa, Oklahoma

Steven C. Clay, President
New Access Communications, Llc
801 Nicollet Mall, Suite 350
Minneapolis, MN 55042
E-mail: sclay@newaccess.com

Richard A. Pitt
12119 Jacqueline Drive
P. O. Box 667
Burlington, WA 98233
Email: rapitt98232@msn.com

Jill Mounsey
Director - External Affairs
AT&T Wireless Services Inc.
7277 164th Avenue NE
Redmond, WA 98052

Richard Stevens
President
Centel Communications Inc.
P.O. Box 25
Goldendale, WA 98620

Tom Cook
Cook Telecom Inc.
2963 Kerner Blvd.
San Rafael, CA 94901

Deanne Laidler
US Cellular
8410 W. Bryn Mawr, Suite 700
Chicago, IL 60631

Robert E. Heath, Vice President
American Fiber Network Inc.
9401 Indian Creek Parkway, Suite 140
Overland Park, KS 66210

Thomas Sawatzki
HighSpeed.Com LLC
6 W. Rose Street, Suite 500
Walla Walla, WA 99362

Rudolph J. Geist
Executive Vice President
O 1 Communications of Washington, LLC
1515 K Street, Suite 100
Sacramento, CA 95814-4052

John B. Glicksman
Vice President, General Counsel
Adelphia Business Solutions
1 North Main Street
Coudersport, PA 16915

Catherine Murray, Manager
Eschelon Telecom of Washington, Inc.
730 Second Avenue South, Suite 900
Minneapolis, MN 55402-2489

Ken Goldstein
Metrocall Inc.
6677 Richmond Highway
Alexandria, VA 22306

Rick Weaver, Regulatory Contact
Westgate Communications, LLC
PO Box 2937
Chelan, WA 98816

Robert T. Hale, President/CEO
Granite Telecommunications, LLC
234 Copeland Street
Quincy, MA 02169

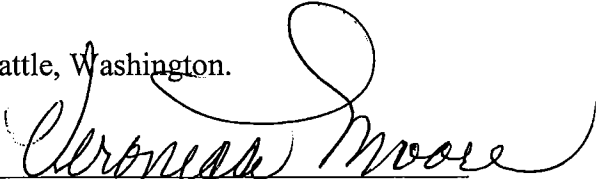
Karen Shoresman Frame
Covad Communications Company
7901 Lowry Blvd.
Denver, CO 80320
E-mail: kframe@covad.com

General Counsel
T-Mobile USA Inc.
12990 SE 38th Street
Bellevue, WA 98006

Irina Armstrong, Regulatory Contact
Metropolitan Telecomm. of Washington
44 Wall Street, Floor 14
New York, NY 10005

I declare under penalty under the laws of the State of Washington that the foregoing is correct and true.

DATED this 14th day of October, 2005, at Seattle, Washington.


Veronica Moore