

STOEL RIVES LLP

ATTORNEYS

ONE UNION SQUARE
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April 19, 1999

RECEIVED
REGISTRATION DIVISION
99 APR 19 PM 3:57
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

RECEIVED BY FAX ON 4-19-99
HARD COPIES RECEIVED 4-20-99

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

VIA FACSIMILE AND EXPRESS MAIL

Ms. Carole J. Washburn
Court Administrator/Clerk
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive Southwest
Olympia, WA 98504-7250

Re: **Electric Lightwave, Inc., and GTE Northwest Incorporated;**
Docket No. UT-980370

Dear Ms. Washburn:

GTE Northwest hereby files the original and five (5) copies of Memorandum of GTE Resolution of Unresolved Issues in the above-referenced proceeding.

Sincerely,



Timothy J. O'Connell

TJOC:smb
Enclosures
cc: Mark Trincherro
ALJ Larry Berg

RECEIVED
STATE OF WASH. UTIL. AND TRANSP. COMMISSION

99 APR 19 PM 3:58

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition for Arbitration of an Interconnection Agreement Between)	Docket No. UT-980370
)	
ELECTRIC LIGHTWAVE, INC.,)	MEMORANDUM OF GTE
and GTE NORTHWEST INCORPORATED)	RESOLUTION OF UNRESOLVED
)	ISSUES
Pursuant to 47 USC Section 252)	
_____)	

On April 13, 1999, the Commission issued in this docket its Notice of Time to File Pleadings Regarding Unresolved Issues and Responses. In that Notice, the Commission sought the parties' position on the appropriate way to resolve the unresolved contractual issues raised by the proposed Interconnection Agreement filed in this case.

GTE was able to work with Electric Lightwave, Inc. ("ELI") to prepare contractual language implementing the arbitrator's decisions, notwithstanding GTE's continued substantive disagreement with those decisions. However, there were two issues which the parties were not able to resolve in the time allowed.

Since the filing of the contract, the parties have tentatively resolved one of those two issues, the language applicable to performance standards. The only contractual provision which is still in dispute between the parties is GTE's proposed amendment to Article VII, which preserves the status quo pending the FCC's determination of what are, or are not, unbundled network elements. GTE believes that this issue is appropriately presented by the contract and the parties'

briefing for resolution by the Commission. The issues presented are purely questions of law and policy, and can be presented to the Commission in the time permitted for approval of the Interconnection Agreement.

Therefore, GTE does not believe that any supplemental process is necessary at this time. GTE anticipates presenting these issues, and the other issues raised in the arbitration, for resolution by the full Commission on May 4, 1999.

Respectfully submitted this 19th day of April, 1999.

STOEL RIVES LLP

By 
Timothy J. O'Connell, WSBA No. 15372
Attorneys for GTE Northwest Incorporated

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition for Arbitration)	Docket No. UT-980370
of an Interconnection Agreement Between)	
)	
ELECTRIC LIGHTWAVE, INC.,)	CERTIFICATE OF SERVICE
and GTE NORTHWEST INCORPORATED)	
)	
Pursuant to 47 USC Section 252)	
_____)	

I hereby certify that I served the foregoing Memorandum of GTE Resolution of Unresolved Issues following named person(s) on the date indicated below by:

- mailing with postage prepaid;
- hand delivery;
- facsimile transmission;
- overnight delivery

to said person(s) a true copy thereof, contained in a sealed envelope, addressed to said person(s) at their last-known address(es) indicated below.

Carole J. Washburn
Court Administrator/Clerk
Washington Utilities and Transportation Commission
1300 S. Evergreen Drive Southwest
Olympia, WA 98504-7250
Fax: (360) 568-1150

Administrative Law Judge Larry Berg
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive Southwest
Olympia, WA 98504-7250
Fax: (360) 568-1150

Mark Trincherro
Davis Wright Tremaine
1300 SW Fifth Avenue, Suite 2300
Portland, OR 97201
Fax: (503) 778-5299

DATED: April 19, 1999



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**Re: Electric Lightwave, Inc., and GTE Northwest Incorporated;
Docket No. UT-980370**

RECEIVED
99 APR 20 AM 9:25
STOEL RIVES LLP
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SEATTLE, WA 98101-3197

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ALJ Larry Berg

ORIGINAL
RECEIVED
DEPT. OF TRANSPORTATION
99 APR 20 AM 9:26
STATE OF WASH.
UTIL. AND TRANSP.

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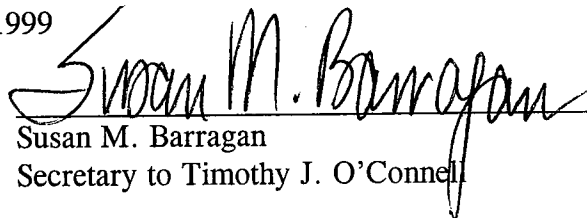
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Fax: (503) 778-5299

DATED: April 19, 1999


Susan M. Barragan
Secretary to Timothy J. O'Connell