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December 19, 2005

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STATE OF WASH
UTIL. AND TRANSP.
COMMISSION

VIA E-MAIL AND 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 Agreed Motion For Modification of Procedural Schedule and a Certificate of Service.

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

Very truly yours,

A handwritten signature in cursive script that reads "Veronica Moore".

Veronica Moore
Assistant to 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

AGREED MOTION FOR
MODIFICATION OF PROCEDURAL
SCHEDULE

STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION
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1. Verizon Northwest Inc. (“Verizon”), on behalf of all parties currently active in this phase of this proceeding, respectfully requests that the Commission modify the procedural schedule in this case as follows, for the reasons set forth below. To the degree that it is applicable to this arbitration, Verizon and the parties request leave to vary from WAC 480-07-385(3) because they were negotiating the schedule set forth below until the last moment.

2. On November 23, 2005, Verizon circulated to counsel for the other active parties in this docket a draft of an amendment to the existing interconnection agreements (“ICAs”). This draft represented Verizon’s attempt to incorporate the rulings of the

ORIGINAL

Arbitrator and Commission in this proceeding into a single ICA amendment; that amendment also incorporated further agreements that Verizon had reached with many of these parties in other jurisdictions.

3. Among those CLEC parties that responded, several indicated a need for additional time to reply to Verizon's conforming ICA amendment. Verizon agreed to accommodate the CLEC parties, but only if all sides could adhere to the following schedule and procedure.

- No later than Saturday, December 31, 2005: CLEC parties send a red-line response to Verizon;
- January 6, 2006: The parties hold a conference call (and further calls as required) to discuss CLEC response(s);
- January 16, 2006: the parties prepare and distribute a final red-line identifying differences in proposed language;
- January 31, 2006: the parties file briefs regarding disputes, if any, over conforming language.

4. The parties have agreed that the January 16, 2006 red-line version of the ICA amendment would serve as basis for any briefing necessary on January 31, 2006. The January 16 red-line would be included with the January 31 briefs.

5. Verizon is making this agreed motion, although the original request to extend the schedule originates from CLEC parties. Verizon believes all parties are in agreement with this request.

6. Therefore, Verizon respectfully requests that the modify the procedural schedule on its docket as set forth above.

Respectfully submitted on December 19, 2005.

By:



Timothy J. O'Connell
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Counsel for Verizon Northwest Inc.