Tim Zawislak/WUTC 06/28/2005 08:11 AM

To Kathy Hunter/WUTC@WUTC

CC

bcc

Fw: Request for Clarification regarding Verizon Northwest's Subject Comments filed on June 8, 2005, in WUTC Docket UT-053021.

Hi Kathy, Could you please place the following e-mail in the Rulemaking File for Docket UT-053021? Thanks, Tim Z.

---- Forwarded by Tim Zawislak/WUTC on 06/28/2005 08:09 AM ----

. 0

Tim Zawislak/WUTC

06/15/2005 04:57 PM

To "Judy Endejan" <jendejan@grahamdunn.com>

cc Bob Shirley/WUTC@WUTC

Request for Clarification regarding Verizon Northwest's Subject Comments filed on June 8, 2005, in WUTC Docket UT-053021.

Hi Judy,

* * * * * * * * *

Included below is the information that Bob Shirley and I discussed with you on this afternoon's impromptu conference call. We would appreciate it if you could coordinate your response with the Company (Verizon Northwest) in clarifying this matter for us prior to the workshop now scheduled for June 29, 2005.

USAC's Filing with the FCC for the 1st quarter of 2005,

(http://www.universalservice.org/overview/filings/)

at page 5, states the following:

"HIGH COST SUPPORT MECHANISM

ELIGIBLE TELECOMMUNICATIONS CARRIER (ETC) DESIGNATION

A requirement for eligibility for receipt of High Cost support is that a common carrier must be designated as an eligible telecommunications carrier (ETC) by a state commission or the FCC in

accordance with Subpart F of the FCC's Part 36 rules and Subpart D of its Part 54 rules. Qualified

ETCs are eligible to receive funds from the High Cost Support Mechanism, which includes High Cost Loop (HCL) support, Interstate Access Support (IAS), Local Switching Support (LSS), Interstate Common Line Support (ICLS), and non-rural forward-looking High Cost Model (HCM) support. Together, the projected requirements for these five components of the High Cost



Support

Mechanism and the USAC administrative expenses constitute the overall funding requirement for the High Cost Support Mechanism

the High Cost Support Mechanism.

..... [table omitted]

Appendix HC01 displays the projected minimum amount of individual company support segregated by rural and non-rural status. Appendix HC01 also contains the projected minimum amount of per-month high cost support for each support mechanism that each ETC[fn11] will be eligible to receive (i.e., HCL, HCM, IAS, LSS, and ICLS)."

* * * * * * * * * *

When we look at Appendix HC01 we see that Verizon Northwest appears to have received in the past (and USAC projects into the future), Interstate Access Support (IAS) for Verizon Northwest's operations in the State of Washington, from the High Cost Support Mechanism of the FCC's <u>Universal Service Fund</u>.

http://www.universalservice.org/overview/filings/2005/Q1/HC01%20-%20High%20Cost%20Support%20Projected%20by%20State%20by%20Study%20Area%20-%201Q2005.xls

Additionally, USAC's website's High Cost Disbursement Data Tool provides information for Verizon Northwest's Study Area Codes (SACs) 522416 and 522449 that also confirms this support was provided to Verizon Northwest during 2003 and 2004. http://form498.universalservice.org/hc/disbursements/default.aspx

Therefore, can you please clarify or provide additional information that forms the basis of Verizon Northwest's position in its filed comments that it, " is not now receiving — and does not expect to receive in the foreseeable future — any federal universal service fund support for its Washington operations "?

Thanks in advance for your follow up on this issue so that we may try to reach a common understanding prior to the workshop scheduled in this matter.

Tim Zawislak
Telecommunications Regulatory Analyst
Washington State - WUTC
(360) 664-1294
tim@wutc.wa.gov
http://www.wutc.wa.gov/telecom