

1 of Verizon's Local Network Access Services tariff that states: "The changes to the terms and
2 conditions approved by the Commission in Advice No. 3110 effective January 15, 2004 in
3 Docket No. UT-031731 remain in effect until August 26, 2006." In support of its Petition,
4 Verizon states as follows:

5 **II. BACKGROUND**

6 4. In the *Waiver Order*, the Commission granted Verizon a waiver to WAC 480-120-560(2)
7 and (3) on a temporary basis as a result of a multi-jurisdictional settlement agreement entered
8 into on August 27, 2003 by Verizon, Sprint, Covad, and AT&T ("Interval Settlement
9 Agreement"). As the Commission noted, the Interval Settlement Agreement included some
10 intervals that were longer, and others that were shorter, than the intervals in WAC 480-120-
11 560(2) and (3). *Waiver Order* at ¶ 2. After due consideration, the Commission found that
12 granting the exemption was "reasonable on a temporary basis until August 26, 2006." *Waiver*
13 *Order* at ¶ 7. August 26, 2006 represented the day after which parties to the Interval Settlement
14 Agreement were no longer prohibited from challenging the intervals included therein. The
15 parties have followed the intervals in the Interval Settlement Agreement in over twenty-five
16 states for the last three years, and the intervals have served the parties well. In fact, Verizon has
17 contacted each of the settlement parties (Sprint, Covad and AT&T), and all are in agreement that
18 the intervals in the Interval Settlement Agreement should continue to apply in Washington as a
19 means of continuing the consistency of collocation implementation across numerous
20 jurisdictions. Accordingly, Sprint, Covad and AT&T support this Petition.

21 **III. ARGUMENT**

22 5. Continuing the waiver of WAC 480-120-560 (2) and (3) would be in the public interest
23 for at least two reasons. First, the intervals in the Interval Settlement Agreement have worked

1 well in all jurisdictions where it was implemented, including Washington. Moreover, as
2 discussed in paragraph 4, all parties to the Interval Settlement Agreement agree that the intervals
3 have worked well and there is no reason to change them at this point in time. In fact, changing
4 the intervals that the settlement parties negotiated and are applying in over twenty-five
5 jurisdictions for just one state would be a substantial hardship on all of the settlement parties.

6 6. Second, any differences in the agreed-upon intervals in the Interval Settlement
7 Agreement and those in the Washington rules reflect the practical realities that the parties have
8 discovered through years of collocation; those differences include benefits to collocators over
9 what is included in the Washington rules. As the Commission noted in the *Waiver Order*, the
10 terms of the Interval Settlement Agreement include some intervals that are shorter than those in
11 the Washington Commission rules. *Waiver Order* at ¶ 2. The terms in the Interval Settlement
12 Agreement also include certain procedures not included in the Washington rules that benefit
13 collocators, such as a requirement that Verizon notify a prospective collocator of any deficiency
14 in its collocation application within eight business days. This term allows a prospective
15 collocator to cure a deficiency within ten calendar days of receiving notice, and thus retain its
16 position within any applicable collocation application queue. The Interval Settlement Agreement
17 also provides for the provision of selected augment requests within forty-five business days of
18 the application receipt date; there is no similar expedited augment interval in the Washington
19 rules.

20 7. Moreover, continuing the intervals that have been in place for three years would not
21 prejudice any collocating party. Any such party, including any party to the Interval Settlement
22 Agreement, could request that the Commission revisit a continuing waiver granted to Verizon
23 with regard to WAC 480-120-560 (2) and (3) at any time.

1 Wherefore, Verizon respectfully requests that the Commission approve this Petition for waiver
2 of the provisions of WAC 480-120-560(2) and (3).

3 Respectfully submitted this _____ day of August, 2006.

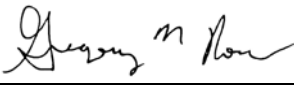
4

5

VERIZON NORTHWEST INC.

6

7

By 

8

Gregory M. Romano
Vice President - General Counsel
1800 41st Street
Everett, WA 98201
(425) 261-5460

9

10

11

12

13