

Verizon Northwest Inc.

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July 31, 2009

Ms. Carole J. Washburn, Executive Secretary Washington Utilities and Transportation Commission Chandler Plaza Building 1300 S. Evergreen Park Drive SW P. O. Box 47250 Olympia, Washington 98504

Re: Verizon Northwest Inc. 2009 ETC Certification Filing as Required by WAC 480-123-070 and WAC 480-123-080

Dear Ms. Washburn:

Enclosed for filing is Verizon Northwest Inc.'s 2009 ETC Certification filing as required by WAC 480-123-070 and WAC 480-123-080. The company considers cost and financial information submitted with this filing confidential and protected under the provisions of WAC 480-07-160 and under the exemption from disclosure requirements per the Public Records Act, Chapter 42.56 RCW. These items are marked "Confidential per WAC 480-07-160". The company, for commercial reasons, may be harmed if this information is not treated by the Commission as confidential. A confidential and redacted copy of the filing is enclosed.

If there are questions on this report, I can be reached on 425.261.6380.

Sincerely,

Lin Fogg

Manager - Public Affairs, Policy and Communications

**Enclosures** 

Verizon Northwest Inc. ("Verizon NW" or the "Company") submits the following reports in accordance with WAC 480-123-070 and WAC 480-123-080.

#### Report No. 1

WAC 480-123-070(1)(a) & (b) – Report on Use of Federal Funds and Benefits to Customers:

In 2008 Verizon NW in Washington received only Interstate Access Support ("IAS"), in the amount of \$10,080,198. These funds, along with other revenues, enabled the Company to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. The amount of investments made and expenses incurred by the Company in 2008 are set forth in its Annual Report filed with the Commission. For example, in 2008, the Company added in property, plant and equipment in Washington. The Company incurred in Plant Specific Expense, which relates directly to maintaining and operating its network in Washington, and it incurred in depreciation expense to recover investments previously made in its network.

These investments and expenditures generally benefit all customers receiving the IAS supported services from the Company within its designated service area.

REDACTED

#### Report No. 2

#### WAC 480-123-070(4) – Report on Complaints per One Thousand Lines:

Verizon NW reports that it is aware of 60 complaints made during 2008 to the Federal Communications Commission ("FCC") and 206 complaints to the Washington Attorney General ("AG"). This corresponds to a number of complaints per 1,000 lines of approximately 0.48.

Of the 60 FCC complaints, only 14 were related to services supported by IAS. Twelve involved billing issues and were resolved with explanations to the customer and with billing adjustments where appropriate. Two complaints involved customer dissatisfaction with collection efforts regarding nonpayment on their accounts. All complaints were resolved to customer's satisfaction.

The remaining 46 FCC complaints were not related to IAS supported services and dealt with DSL service, satellite TV, long distance service, wireless, other carriers' bills, slamming and inside wire. The majority of the complaints were resolved by making adjustments to the customer's account when a credit was due.

Of the 206 AG complaints, 87 were related to IAS supported services. The majority of the complaints concerned billing issues. All were resolved, where appropriate, with explanations to the customers and billing adjustments. Others were related to miscellaneous issues, such as collection efforts, customers not wanting to receive Verizon marketing materials, customers disagreeing with company procedures on repair or install times.

The remaining 119 AG complaints were not related to services supported by IAS and dealt with DSL service, long distance service, DirecTV, Verizon Wireless, billing for inside wire work and billing for yellow page advertising. The majority of the complaints were resolved by making adjustments to the customer's account when a credit was due.

### Report No. 3

WAC 480-123-070(5) – Certification of Compliance with Applicable Service Quality Standards;

WAC 480-123-070(6) - Certification of Ability to Function in Emergency Situations:

See attached affidavit.

## CERTIFICATION OF SERVICE QUALITY STANDARDS AND EMERGENCY FUNCTIONALITY AS REQUIRED BY WAC 480-123-070 (5) AND (6)

In compliance with Washington Administrative Code (WAC) 480-123-070 (5) and (6) I certify the following:

- 1) That during the 2008 calendar year, the Company met substantially the applicable service quality standard found in WAC 480-123-030(1)(h); and
- 2) That during the 2008 calendar year, the Company maintained the ability to function in emergency situations under the standard found in WAC 480-123-030(1)(g), as such standard relates to functionality of wireline carriers in emergency situations.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

7/27/09 THOUSAND OAKS,
Date and Place)

MARGARET C. SERJAK

(Printed Name)

VICE PRESIDENT - OPERATIONS

(Title)

## Report No. 4

WAC 480-123-070(7) – Advertising Certification:

See attached affidavit.

## **CERTIFICATION OF TELEPHONE ASSISTANCE PROGRAM & INDIAN** RESERVATION ADVERTISING AS REQUIRED BY WAC 480-123-070 (7)

In compliance with Washington Administrative Code (WAC) 480-123-070 (7) I certify the following:

1) That during the 2008 calendar year, the Company publicized the availability of its applicable telephone assistance programs in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the Company's designated ETC service area and in a manner which, in the Company's judgment, included advertisements likely to reach those who are not current customers of the Company within the Company's designated service area.

I certify (or declare) under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

(Date and Place)

IMOTHY J. McCALLION
(Printed Name)

PRESIDENT - WEST REGION

#### Report No. 5

WAC 480-123-080(1)(a) and (2) – Annual Plan for Universal Service Support Expenditures:

From October 1, 2008 through September 2009 Verizon NW will receive only Interstate Access Support. The Company will use these funds and other revenues to continue to provide services at a level that meets the intent set forth in 47 U.S.C. §254. The nature and magnitude of its investments and expenditures are anticipated to be similar to those for the prior period. They are expected to benefit customers generally by helping enable the Company to continue to provide good quality supported services.