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March 14, 2006

Carole Washburn, Executive Secretary Washington Utilities & Transportation Commission 1300 Evergreen Park Drive, SW Olympia, WA 98504

Re: In the Matter of the Petition for Arbitration of an Amendment for Interconnection Agreements of Verizon Northwest, Inc., et al., Docket No. UT-043013, Statement of Supplemental Authority

Dear Ms. Washburn:

Verizon Northwest Inc. ("Verizon") submits as supplemental authority the following recent decisions in Verizon's *Triennial Review Order/Triennial Review Remand Order* arbitrations in other states: (1) the California Public Utilities Commission's Decision Adopting Amendment to Existing Interconnection Agreements, App. 04-03-04 (approved by the Commission on Feb. 16, 2006) ("California Ruling"); (2) the decision of the Vermont Public Service Board in Docket No. 6932 (which starts at page 246 of the attached document) ("Vermont Ruling"); and (3) the Arbitrators' Proposal for Award in Docket No. 29451 of the Texas Public Utility Commission ("Texas Proposed Award"). Among other rulings, all of these decisions recognize that the FCC's fiber unbundling rules do not distinguish among customer groups, so that fiber unbundling relief applies to both mass-market and enterprise customers. *See* pages 21-24 of the California Ruling, page 257 of the Vermont Ruling and page 100 of the Texas Proposed Award.

Please do not hesitate to contact me if this raises any questions or concerns.

Sincerely,

Timoth∤ J. Ø'Connell

TJO:vm ⁶ Enclosures

cc: ALJ Rendahl (w/encls.)

Gregory J. Kopta (w/encls.)
Service List (w/o encls.)