

**PROPOSED BRIEF OUTLINE  
DOCKET NO. UT-020406**

**I. Introduction**

**II. Discussion**

- A. What Should Verizon's Access Charges Be, and Why
  - 1. Terminating Rates (including ITAC)
  - 2. Originating Rates
- B. Imputation Issues
  - 1. Access Costs (including the Conversion Factor)
  - 2. Billing and Collection Costs
  - 3. Retailing/Marketing Costs
  - 4. Other Costs
  - 5. Applicability to Verizon Affiliates
  - 6. Whether there is a price squeeze/remedies
- C. Do Verizon's Access Charges Violate State Or Federal Law As Alleged In AT&T's Complaint?
- D. Verizon Earnings Issues
- E. What is the Impact of WAC 480-120-540 or Other Commission Orders?
- F. How Should an Access Charge Reduction Be Implemented, if the Commission Decides that Such a Reduction is Appropriate?

**III. Conclusion**