

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**In the Matter of the Development of )  
Universal Terms and Conditions for ) Docket No. UT-011219  
Interconnection and Network Elements )  
to be Provided by Verizon Northwest Inc. )**

**VERIZON NORTHWEST INC.'S MOTION TO EXTEND  
DEADLINE FOR FILING MODEL AGREEMENT**

Verizon Northwest Inc. (“Verizon”), by counsel, hereby moves to extend the deadline for filing its model agreement from September 25 to October 9, 2002. Verizon requests this two-week extension because it is currently in the process of revising its model agreement, largely as a result of the recent decision by the FCC in the Virginia arbitration.<sup>1</sup> Because the model agreement filed in this docket will serve as a basis for the parties’ negotiations of the universal terms and conditions for interconnection and network elements provided by Verizon in Washington, it is important that it include the most up-to-date terms and conditions offered. Verizon expects to complete the revisions soon, but cannot do so by September 25, the current due date contained in the Third Supplemental Order. It can complete the revisions and will be prepared to file its revised model agreement by October 9.

The current schedule includes five months for informal negotiations prior to filing a disputed issues list. *See* Third Supplemental Order, ¶ 17. A two-week extension will not affect this schedule. Moreover, it should not cause a hardship for any party because the parties have not yet set a date for the first negotiation session. Finally, the parties in this case have indicated through counsel that they do not object to the requested two-week extension. Therefore, Verizon

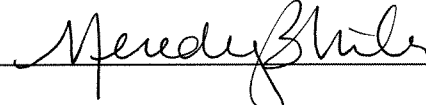
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<sup>1</sup> *In the Matter of Petition of WorldCom, Inc., Cox Virginia Telcom, Inc., and AT&T Communications of Virginia Inc., Pursuant Section 252(e)(5) of the Communications Act for Preemption of the Jurisdiction of the Virginia State Corporation Commission Regarding Interconnection Disputes with Verizon Virginia Inc.*, CC Docket Nos. 00-218, 00-249, 00-251, DA 02-1731, Memorandum Opinion and Order 2002 WL 1576912 (F.C.C.).

respectfully requests that the Commission extend the deadline for Verizon to file its model interconnection agreement to October 9, 2002.

Respectfully submitted,

VERIZON NORTHWEST INC.

By  \_\_\_\_\_

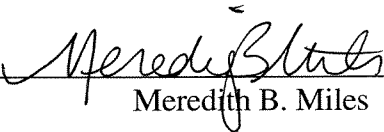
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Dated: September 23, 2002.

**CERTIFICATE OF SERVICE**

I hereby certify an original and eleven copies of Verizon Northwest Inc.'s Motion to Extend the Deadline for Filing Model Agreement were sent by overnight mail and one copy sent by electronic mail to Ms. Carole J. Washburn, Executive Secretary, Washington Utilities & Transportation Commission, 1300 S. Evergreen Park Drive SW, Post Office Box 47250, Olympia, WA 98504-7250 and to the parties below by regular and electronic mail:

DATED this 23<sup>rd</sup> day of September, 2002.

  
Meredith B. Miles

The Honorable Theodora M. Mace  
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Washington Utilities and Transportation  
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