

October 7, 2004

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**VIA E-MAIL & FEDERAL EXPRESS**

Ms. Carole Washburn  
Secretary  
Washington Utilities and Transportation Commission  
P.O. Box 47250  
1300 South Evergreen Park Dr. S.W.  
Olympia, WA 98504-7250

**Re: WUTC v. Verizon Northwest Inc.  
Docket No. UT-040788**

Dear Ms. Washburn:

Enclosed please find the original and 15 copies of Response of Verizon Northwest Inc. to Public Counsel, AARP and WeBTEC's Motion to Compel Responses to Data Requests. Please stamp one of the copies and return it to us in the enclosed stamped self-addressed envelope provided for your convenience.

If you should have any questions, please contact me. Thank you.

Sincerely,

**GRAHAM & DUNN PC**



Nancy E. Dickerson  
Assistant to Judith A. Endejan

Enclosures

cc: All Parties

m29664-541790.doc

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CERTIFICATE OF SERVICE

I hereby certify that I have this 7<sup>th</sup> day of October 2004, served the true and correct original along with the correct number of copies, of the attached document upon the WUTC, via the method(s) noted below, properly addressed as follows:

Ms. Carole Washburn	<input type="checkbox"/>	U.S. Mail, Postage Prepaid
Secretary	<input type="checkbox"/>	Hand Delivered
Washington Utilities and Transportation	<input checked="" type="checkbox"/>	Overnight Mail (Federal Express)
Commission	<input type="checkbox"/>	Facsimile (360) 586-1150
P.O. Box 47250	<input checked="" type="checkbox"/>	Email ( <a href="mailto:records@wutc.wa.gov">records@wutc.wa.gov</a> )
1300 South Evergreen Park Dr. S.W.		
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I hereby certify that I have this 7<sup>th</sup> day of October 2004, served a true and correct copy of the attached document upon parties of record, via the method(s) noted below, properly addressed as follows:

<i>On Behalf of Public Counsel:</i>	<input checked="" type="checkbox"/>	U.S. Mail, Postage Prepaid
Simon ffitc	<input type="checkbox"/>	Hand Delivered
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Robert C. Wallis	<input checked="" type="checkbox"/>	U.S. Mail, Postage Prepaid
Administrative Law Judge	<input type="checkbox"/>	Hand Delivered
Washington Utilities and	<input type="checkbox"/>	Overnight Mail
Transportation Commission	<input type="checkbox"/>	Facsimile (360) 586-8203
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<i>On Behalf of The Washington Electronic</i>	<input checked="" type="checkbox"/>	U.S. Mail, Postage Prepaid
<i>Business &amp; Telecommunications Coalition</i>	<input type="checkbox"/>	Hand Delivered
<i>("WeBTEC"):</i>	<input type="checkbox"/>	Overnight Mail
Arthur A. Butler	<input type="checkbox"/>	Facsimile (206-467-8406)
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*On Behalf of AARP:*

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*On Behalf of Commission Staff:*

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*On Behalf of Integra Telecom of Washington:*

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*On Behalf of AT&T Communications of the Pacific Northwest (AT&T):*

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*On Behalf of Northwest Public  
Communications Council (NPCC):*

Brooks E. Harlow  
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*On Behalf of Citizens' Utility Alliance of  
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*On Behalf of The United States Department of  
Defense:*

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

DATED this 7<sup>th</sup> day of October, 2004, at Seattle, Washington.

By Nancy E. Dickerson  
Nancy E. Dickerson  
Legal Secretary