

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

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|--|---|----------------------|
| In the Matter of the Review Of         | ) |                      |
| Unbundled Loop and Switching Rates and | ) | Docket No. UT-023003 |
| Review of the Deaveraged Zone Rate     | ) |                      |
| Structure                              | ) |                      |

**VERIZON NORTHWEST INC.'S MOTION TO SUSPEND SCHEDULE**

Verizon Northwest Inc. (“Verizon NW”), by counsel, respectfully requests that the Washington Utilities and Transportation Commission (“Commission”) suspend the current schedule in Docket UT-023003 and set a pre-hearing conference to consider a new schedule once an order is issued on reconsideration and clarification of its 32<sup>nd</sup> Supplemental Order in UT-003013 Part B (“Part B Order”). Verizon NW requests further that the Commission expedite its consideration of this motion inasmuch as cost models and testimony in UT-023003 are due August 16, 2000. In support of its motion, Verizon NW states as follows:

1. On April 2, 2002, the Commission established a procedural schedule to review unbundled loop and switching rates and the deaveraged zone rate structure. The Commission’s Second Supplemental Order scheduled a filing date for direct evidence of August 16, 2002 for all parties except Commission Staff.

2. As stated in an off-the-record conversation during the March 15, 2002 pre-hearing conference, Verizon intends to file ICM to establish unbundled loop and switching rates. This is the same model filed with the Commission in Docket UT-003013 Part B.

3. During the March 15, 2002 pre-hearing conference, AT&T and XO proposed that the scope of this proceeding include a review of certain costs and rates arising out of the Commission’s orders in UT-003013 Part A and Part B. All parties agreed that their position would be influenced by the Commission’s Part B Order. Consequently, the Commission stated that subsequent to entry of the Part B Order, it would request the parties to file comments

specifically identifying those rates developed in Docket UT-003013 that should be addressed in UT-023003. Second Supplemental Order ¶¶ 13-14.

4. On June 21, 2002, the Commission issued its Part B Order, which required Verizon NW to modify its non-recurring cost studies and ICM. Verizon NW is unable to make some of the modifications ordered by the Commission absent clarification. Other modifications cannot be made without significant changes to ICM, and Verizon NW has been unable to determine the amount of time necessary to make these changes.

5. Concurrent with this motion, Verizon NW is filing a motion for reconsideration and clarification of the Part B Order in UT-003013. Any modifications to ICM and Verizon's non-recurring cost studies still required after the Commission rules on reconsideration will have to be addressed in a compliance filing in UT-003013, as well as in Verizon NW's direct case in this proceeding. Due to resource constraints, Verizon NW cannot complete a compliance filing concurrent with its direct case in this proceeding.

6. The current schedule will not allow any changes to ICM and Verizon NW's non-recurring costs ordered by the Commission in Part B to be incorporated into Verizon's direct case in this proceeding. Moreover, the current schedule will not allow costs to be developed for rates beyond the initial elements identified by the Commission to be addressed in this proceeding.

7. Given the undisputed impact of the Commission's decisions in UT-003013 Part B on Verizon NW's direct case in this proceeding, the Commission should suspend the current schedule until it issues an order on reconsideration and clarification of the Part B Order. Within five business days of that order, Verizon NW will inform the Commission of the amount of time necessary to make any modifications to its cost studies ordered by the Commission. At that time,

the Commission can serve a notice for a pre-hearing conference to address rates developed in Docket UT-003013 that will be examined in this proceeding, and set a new procedural schedule.

8. Further, Verizon respectfully requests that this Commission expedite its consideration of this motion. An expedited decision to suspend the schedule in this proceeding will allow all parties and the Commission time to determine how to proceed, will conserve the resources of the Commission and the parties, and will avoid filing cost models and testimony that would have to be revised and supplemented to reflect the final resolution of UT-003013 Part B.

Respectfully submitted,

Verizon Northwest Inc.

By \_\_\_\_\_

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