

RIVERFRONT PLAZA, EAST TOWER 951 EAST BYRD STREET RICHMOND, VIRGINIA 23219-4074

TEL 804 • 788 • 8200 FAX 804 • 788 • 8218

MEREDITH B. MILES DIRECT DIAL: 804-788-7365 EMAIL: mmiles@hunton.com

FILE NO: 56423.001712

October 8, 2002

### BY OVERNIGHT MAIL AND ELECTRONIC MAIL

The Honorable Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Post Office Box 47250
Olympia, Washington 98504-7250

### Docket No. UT-011219

Dear Ms. Washburn:

Enclosed for filing in the above-referenced docket is the original and eleven (11) copies of Verizon Northwest Inc.'s Motion to Further Extend the Time for Filing Model Agreement.

Thank you for your assistance. Please contact me should you have any questions.

Sincerely yours,

Meredith B. Miles

cc: The Honorable Theodora M. Mace (by overnight mail and electronic mail)

Service List (by first class and electronic mail)

W. Jeffery Edwards, Esq.

Ms. Patty Nelson

## 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 FURTHER EXTEND THE TIME FOR FILING MODEL AGREEMENT

Verizon Northwest Inc. ("Verizon"), by counsel, hereby moves to further extend the time in which to file its model interconnection agreement from October 9 to October 18, 2002.

Verizon requests this additional extension because, despite its best efforts, the model interconnection agreement is not yet complete. The process of revising its model agreement has proven more time consuming than originally forecast. Verizon expects to complete the revisions very soon, but in an abundance of caution, seeks an additional nine-day extension. A nine-day extension will not affect the schedule for this proceeding.

As soon as Verizon learned that the model agreement would not be complete by October 9, Verizon contacted counsel to each of the active parties to this proceeding, including the Commission Staff, and informed them of the situation. Verizon also inquired into whether any of the parties object to Verizon's seeking this further extension so that it can file its most up-to-date model agreement. None of the parties object. Therefore, Verizon respectfully requests that the Commission extend the deadline for Verizon to file its model interconnection agreement to October 18, 2002.

# Respectfully submitted,

# VERIZON NORTHWEST INC.

W. Jeffery Edwards

Meredith B. Miles

Hunton & Williams

951 East Byrd Street

Richmond, Virginia 23219 (804) 788-8200

Dated: October 8, 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 8<sup>th</sup> day of October, 2002.

Meredith B. Miles

The Honorable Theodora M. Mace
Administrative Law Judge
Washington Utilities and Transportation
Commission
Administrative Law Section
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250
tmace@wutc.wa.gov

Michel Singer Nelson WorldCom, Inc. Law and Public Policy 707 17th Street, Suite 4200 Denver, CO 80202 Phone: 303/390-6106

Phone: 303/390-6100 Fax: 303/390-6333

michel.singer\_nelson@wcom.com

Mary M. Tennyson Senior Assistant Attorney General WUTC Staff P.O. Box 40128 1400 S. Evergreen Park Drive S.W. Olympia, WA 98504-0128 Phone: 360/664-1220

Fax: 360/586-5522 mtennyso@wutc.wa.gov

Simon ffitch
Office of the Attorney General
Public Counsel
900 – 4<sup>th</sup> Avenue, Suite 2000
Seattle, WA 98164-1912
Phone: 206/464-7744

Fax: 206/389-2058 simonf@atg.wa.gov

Karen J. Johnson Deborah Harwood

Integra Telecom of Washington, Inc. 19545 NW Von Neumann Drive, Suite 200

Beaverton, Oregon 97006 Phone: 503/748-2048 Phone: 503/748-1955 Fax: 503/748-1976

brightwell@att.com

<u>kjohnson@integratelecom.com</u> dharwood@integratelecom.com

Cathy Brightwell
Assistant Vice President
AT&T Law and Government Affairs
2120 Caton Way SW
Olympia, WA 98502-1106
Phone: 360/705-3977
Fax: 360/705-4177

Dan Horton Chief Technology Officer Fox Communications Corp. 5210 Carillon Point Kirkland, WA 98033 voice: (425) 649-1360 facsimile: (888) 926-7371 dhorton@whoscalling.com

Brian Thomas
Vice President of Regulatory
Time Warner Telecom
520 SW Sixth Avenue, Suite 300
Portland, OR 97229
voice: (503) 416-1588
facsimile: (503) 416-1876
brian.thomas@twtelecom.com

Gregory J. Kopta
Davis Wright Tremaine LLP
Representing AT&T, TCG, XO, Fox & TWTC
2600 Century Square
1501 Fourth Avenue, Suite 2600
Seattle, WA 98101-1688
Phone: 206/628-7692
Fax: 206/628-7699

Letty Friesen AT&T Law and Government Affairs 1875 Lawrence Street, Room 1575 Denver, CO 80202 Phone: 303/298-6475 Fax: 303/298-6301

gregkopta@dwt.com

lsfriesen@att.com

Rex Knowles
Vice President Regulatory
XO
111 East Broadway, Suite 1000
Salt Lake City, UT 84111
Phone: 801/983-1504
Fax: 801/983-1667
rex.knowles@xo.com