

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Review of)
Unbundled Loop and Switching Rates; the)
Deaveraged Zone Rate Structure; and)
Unbundled Network Elements, Transport,)
and Termination)

Docket No.
UT-023003

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**RESPONSE OF VERIZON NORTHWEST INC.
TO STAFF'S MOTION TO EXTEND FILING SCHEDULE**

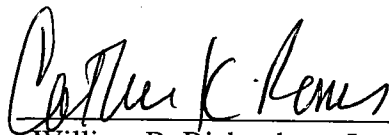
Pursuant to the Notice issued by the Administrative Law Judge on July 29, 2003, Verizon Northwest Inc. ("Verizon") respectfully submits this response to the Staff's motion to extend the date for filing response testimony in the recurring cost phase of this case to October 3, 2003, and the date for filing rebuttal testimony in such phase to November 14, 2003.

Verizon has no objection to extending the response testimony filing date to October 3.¹ Verizon requests a brief additional period for the filing of rebuttal testimony. November 14, the date proposed by Staff, falls during the course of several days in which all of the lawyers responsible for the filing of Verizon's direct and associated rebuttal testimony will be out of the country. In light of that timing, and the complexity of the issues expected to be addressed in the rebuttal testimony, and because these same lawyers will be participating in similar proceedings

¹ Based on the discussions at the prehearing conference of August 1, 2003, it appears that AT&T now seeks to recast its direct testimony to substitute entirely new customer location data that Verizon supplied to AT&T over a month before AT&T filed that testimony. *See also* Direct Testimony of Dr. Mark T. Bryant at 29 (referring to certain undefined "problems in processing customer location data for Verizon" and a future "update to the Verizon database"). At no time after seeking such information in December 2002, or receiving it on May 23, 2003, did AT&T ever suggest to Verizon or to the Commission that it needed any such data at any earlier date. It would be wholly inappropriate for AT&T to be permitted to recast its cost studies in this fashion over a month after filing its case simply because data requests now question the reliability of the surrogate data AT&T chose to use instead. But if AT&T were permitted to do so, the proposed October 3 date for response to any such "update" would very likely be inadequate.

in other states during this same period, Verizon requests that parties be permitted to file and serve their rebuttal testimony electronically on Monday, November 24, with hard copy to be filed on the following day. This brief extension will still permit more than a month in which to prepare for the January hearings now scheduled for the recurring phase of this case. Verizon is authorized to state that Staff, WorldCom, and Qwest do not object to this proposed change to the requested November 14 date, and that AT&T takes no position on it.

Respectfully submitted,



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