

September 8, 2003

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ORIGINAL

VIA FACSIMILE AND 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

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STATE OF WASH.  
UTIL. AND TRANSP.  
COMMISSION

**Re: AT&T of the Pacific Northwest, Inc. v. Verizon Northwest Inc.  
Docket No. UT-020406**

Dear Ms. Washburn:

Verizon Northwest Inc. requests permission to respond to Staff's comments on Verizon's price floor calculation by the close of business on Wednesday, September 10, 2003. Verizon also requests permission to file these comments electronically with hard copies to follow in the mail to the Commission and the parties.

Verizon should be allowed to respond because Staff's comments contain several misstatements, and Verizon's response will assist the Commission in reaching its decision on Verizon's compliance filing. While the Commission's August 25, 2003 notice invited parties to respond on Verizon's proposed price floor calculation, Verizon did not interpret this notice as calling for Verizon's comments on its own filing. Allowing this response now is appropriate, just as allowing parties one opportunity to reply to the Staff's Petition for Reconsideration was appropriate.

Verizon's request to respond to Staff's comments, however, does not mean that Staff should be permitted to respond to Verizon's comments on Staff's Petition for Reconsideration. WAC 480-09-810 does not call for replies to petitions for reconsideration. Moreover, in both the price floor comments and the petition for reconsideration, each party has had one opportunity to present its position, and Staff should not be given an additional opportunity to comment on its petition for reconsideration.

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Sincerely,

**GRAHAM & DUNN PC**

A handwritten signature in black ink, appearing to read "Judith A. Endejan". The signature is written in a cursive style with a prominent flourish at the end.

Judith A. Endejan

JAE/ned

cc: All Parties  
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