

Exhibit No. ___ (TWZ-11)
Docket No. UT-040788
Witness: Timothy W. Zawislak

BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Complainant,

v.

VERIZON NORTHWEST INC.,

Respondent.

DOCKET NO. UT-040788

EXHIBIT TO TESTIMONY
OF
TIMOTHY W. ZAWISLAK

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Verizon NW Response to Staff Data Request No. 283

November 22, 2004

DATA REQUEST NO. 283:

Verizon Northwest Inc.'s response to WUTC STAFF DATA REQUEST NO. 259 stated the following:

For twelve months ending September, 2003, Verizon Northwest – Washington recorded line sharing revenue of:

FCC Account	Total Regulated
5060	17,939
5240	1,384,206
Total	1,402,145

Please provide a breakdown of this line sharing revenue by units sold to each carrier customer and identify each carrier customer by name, including any affiliates or intracompany transactions (e.g. regulated/nonregulated). The following table is an example of the format requested:

EXAMPLE

	Account 5060 Line Sharing Test Year Units	Account 5240 Line Sharing Test Year Units	Account 5060 Line Sharing Test Year Revenue	Account 5240 Line Sharing Test Year Revenue
Customer A (state name)	5	100	a	v
Customer B (state name)	10	200	b	w
Customer C (state name)	15	300	c	x
Verizon NW nonregulated	20	400	d	y
Verizon Affiliate (state name)	50	500	e	z
Totals	100	1500	\$17,939	\$1,384,206

RESPONSE: (filed July 2, 2004)

Verizon objects to this data request to the extent that it calls for Verizon to disclose confidential individual customer detail that it is prohibited by contract from disclosing and because the detail requested is not relevant to the issues to this case or likely to lead to the discovery of relevant evidence in this case. Without waiver of the foregoing, Verizon will provide Washington-specific data for total, or aggregate, non-affiliate and affiliate.

(Amounts in Whole Units and Dollars)

	Account 5240 Line Sharing Test Yr Units		Account 5240 Line Sharing Test Yr Revenue
NON AFFILIATE	2,139	\$	244,872
AFFILIATE	0	\$	0
TOTAL	2,139	\$	244,872

Prepared By: Jane Lee
Date: June 28, 2004
Witness: Nancy Heuring

SUPPLEMENTAL RESPONSE:

Based on the letter dated September 3, 2004 from Chris G. Swanson to Judith Endejan, Staff has asked for clarification as to whether "affiliate" includes nonregulated or interstate. Per the Company's original response to this request, it stated that 2,139 units and \$244,872 (in account 5240) are included in the test year from non-affiliate customers. Line sharing is an unbundled network element (UNE). Workpaper S3 shows that UNE revenue in account 5240 is separated with 75.2379% going to the intrastate jurisdiction, with the residual going to interstate. As such, none of this amount is considered nonregulated.

Prepared by: Cory Legner
Date: September 17, 2004
Witness: Nancy Heuring