

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

AT&T COMMUNICATIONS OF)	
THE PACIFIC NORTHWEST,)	DOCKET NO. UT-020406
INC.,)	
)	
Complainant,)	VERIZON’S MOTION FOR
)	RECONSIDERATION OF THE
v.)	THIRTEENTH SUPPLEMENTAL
)	ORDER
VERIZON NORTHWEST INC.,)	
)	
Respondent.)	
.....)	

Verizon Northwest Inc. (Verizon) asks the Commission to reconsider its Thirteenth Supplemental Order (“the Order”). There, the Commission rejected Staff’s proposed changes to Verizon’s price floor calculation, but also rejected Verizon’s amended price floor calculation because it includes “a significant change in the ‘Wholesale S/A/M Expense/Access MOU’ factor.” (Order at para. 7). According to the Commission, this change was not argued on the record, and Exhibit 113C suggests that the factor “does not vary with a change in the level of originating or terminating access charges, which are the changes the Commission directed.” (*Id.*) Therefore, the Commission directed Verizon to recalculate its price floor consistent with the factor reflected in Exhibit No. 111C, page 4. (*Id.*) Verizon has recalculated the floor as directed by the Order, and this recalculation is attached as Confidential Exhibit A.

Verizon, though, respectfully requests that the Commission reconsider its decision. The Commission is correct that the *factor* does not vary with a change in the level of originating or terminating access charges; however, the *costs* determined by the factor do, in fact, change.

The price floor calculation that Verizon submitted on August 29, 2003 does not reflect a change to the “Wholesale S/A/M Expense/Access MOU” factor; indeed, the factor Verizon used in its calculation is the same factor set forth in Exhibit 111C. Verizon's wholesale marketing cost per minute, however, did change. This cost is calculated by multiplying (1) the wholesale sales/advertising/marketing ("SAM") factor by (2) the total originating access charges per minute. Again, Verizon did not change its wholesale SAM factor; rather, Verizon simply applied the factor to the new originating access rates established by the Commission. This is a standard “compliance-type” filing, and therefore the record need not be reopened.

In short, Verizon did not change the factor. The Commission should reverse its decision and accept Verizon’s price floor calculation of August 29, 2003. If, however, the Commission does not agree, then it should accept the revised (lower) price floor calculation required by the Order, which is attached.

Dated this _____ of September, 2003.

Respectfully submitted,
Verizon Northwest Inc.

By _____
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