Exhibit No. ___ (TWZ-19-C)
Docket No. UT-040788
Witness: Timothy W. Zawislak
REDACTED VERSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,

Complainant,

DOCKET NO. UT-040788

v.

VERIZON NORTHWEST INC.,

Respondent.

EXHIBIT TO TESTIMONY OF TIMOTHY W. ZAWISLAK

STAFF OF WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Verizon NW Response to Staff Data Request No. 261

November 22, 2004

REDACTED VERSION

Docket No. UT-040788 -WUTC Staff Data Requests to Verizon Nos. 246-261 June 7, 2004

Data Request No. 261:

Provide the level of Operational Support Systems (OSS) revenue and expenditures (including investment and expenses) booked by Verizon Northwest Inc., state of Washington, by account number, for the period beginning October 1, 2002, through September 30, 2003.

RESPONSE:

Specific revenue, expenses, and investments for OSS are not identifiable in the financial system.

Prepared By: Jane Lee Date: June 1, 2004

Witness: Nancy Heuring

Docket No. UT-040788 – General Rate Case Verizon Supplemental Response to WUTC Staff Data Request No. 261 September 16, 2004

DATA REQUEST NO. 261 (Supplement):

This is a supplement to Staff Data Request No. 261. The purpose of this supplement is to identify the Company's response to date, and the Staff/Company discussions to date, regarding this request. Finally, it is Staff's understanding that the Company has agreed to provide a supplemental response to this data request by September 15, 2004.

Staff Data Request No. 261 seeks the following information:

Data Request No. 261:

Provide the level of Operational Support Systems (OSS) revenue and expenditures (including investment and expenses) booked by Verizon Northwest Inc., state of Washington, by account number, for the period beginning October 1, 2002, through September 30, 2003.

The Company responded to this data request on June 7, 2004. The Company stated in its response:

RESPONSE:

Specific revenue, expenses, and investments for OSS are not identifiable in the financial system.

Staff has discussed that response with the Company on the following dates: June 9, 2004, June 16, 2004, and June 23, 2004. The result of those discussions is that the Company agreed to do a special study that would take more time than the standard discovery deadline would allow. The Company therefore suggested that this study would be available by mid-September. Staff expects that the Company will provide a supplemental answer to Data Request No. 261 that is responsive to the question via its special study, no later than September 15, 2004.

SUPPLEMENTAL RESPONSE:

Verizon repeats its position that specific revenue, expenses, and investment for OSS are not identifiable in the financial system for a specific timeframe.

OSS revenues from transition surcharges were identified by a special query run against the appropriate IOSCs. Since OSS transition costs are not identifiable in the accounting system, Verizon has estimated the Washington expenses related to OSS transition costs through special studies. Please see Confidential Attachment 261 for the revenues and estimated expenses, by account number, in the test year.

Prepared By: Gregg Diamond Date: September 15, 2004

Witness: Kevin Collins or another SME to be identified at a later time.

Verizon Supplemental Response to WUTC Staff Data Request No. 261 UT-040788

Confidential Attachment 261

(Confidential per Protective Order in WUTC Docket No. UT-040788)

Verizon Northwest, Inc. - State of Washington OSS Transition Revenue and Expense Test Year Ended September 30, 2003

Confidential Attachment 261
Page 1 of 3

Total Washington

Revenue

Expense

VZ Northwest, Inc. - State of Washington OSS Transition Surcharge Test Year Ended September 30, 2003

Oct 02-Sep 03 Sep '03 @\$3.27 / unit Jul '03 Aug '03 Jun '03 May'03 Apr. '03 Mar 703 Feb '03 Jan'03 Dec '02 Oct '02 Nov '02 OSC S COMP

₹ ₹ CTNW GTNW CTNW GTNW GTNW

₹ ₹ ₹ \$

TOTAL TOTAL TOTAL



Confidential Attachment 261 Page 3 of 3

Year Incurred	Total OSS Transition Costs (1)	Total Amortization During Test Year	WA Allocation Factor	Total WA Test Year Expense	FCC Account
1999 2000 2001 2002 Sep 2003 ytd (2)					

- Notes: (1) Amounts are per Cost Studies performed by Service Cost and are reflected in OSS Transition Cost fillings. The software costs are captured by DPSRs in VDSI's system.
 - (2) Assume Jan-Sep 2003 purchases evenly by quarter and billed to Telcos a qtr in arrears:

	<u>1st gtr</u>	2nd gtr	3rd qtr	<u>Total</u>
Software Capitalized	\$		•	
# Months Amortized: Amortization:	\$			•