

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Review of
Unbundled Loop and Switching Rates and
Review of the Deaveraged Zone Rate
Structure.

DOCKET NO. UT-023003
COMMISSION STAFF
RESPONSE TO VERIZON
MOTION TO COMPEL

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STATE OF WASH.
UTILITIES AND TRANSP.
COMMISSION

1 Pursuant to the Commission's notice of August 12, 2003, the Commission Staff
(Staff) submits this response to Verizon Northwest Inc.'s (Verizon) Motion to Compel
Discovery With Respect to the HM 5.3 Cluster Database. Because the data requests are
not directed to Staff, our comments are intended to respond to certain misstatements in
Verizon's motion, rather than to the individual data requests.

2 At page 4 of its motion, Verizon states, "The database and clustering process lay
the foundation for the network being modeled and have a direct impact on every cost
component of the modeled network. If this foundation is inaccurate, all UNE cost
estimates produced by HM 5.3 will be inaccurate and thus useless for this proceeding."
This is a misstatement of the importance of the cluster data.

3 First, cost estimates are just that – estimates. Because of the many complexities of
the telecommunications network, no cost model can accurately replicate the cost of the
existing network. Therefore, the process of estimating cost is one of *relative* accuracy,
not *absolute* accuracy.

4

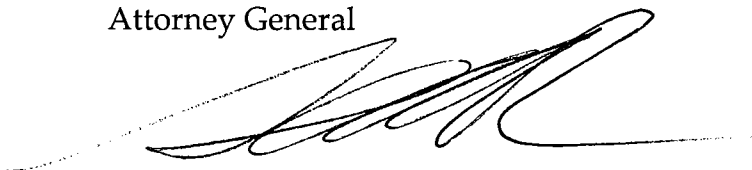
Second, Staff disagrees that the customer location information Verizon requests in its data requests has a direct impact on every cost component of the modeled network. Verizon's Motion, at 4. For example, switching, interoffice facilities, and signaling network component costs are not affected by customer location information within wire centers.

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Finally, Verizon has in its possession the information necessary to establish whether customer locations have been accurately located. Each data cluster specifies the geographic area and location of the boundaries within which a certain number of business, residential, and other lines are located. Because Verizon built the network that serves all of these customers, it already possesses the information it needs to conduct its own analysis of the accuracy of the HAI cluster data customer locations.

Dated: August 29, 2003.

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