

Exhibit No. ___ (PMS-23)
Docket No. UT-040788
Witness: Paula M. Strain
REDACTED VERSION

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
PAULA M. STRAIN
REGARDING REVENUE REQUIREMENTS

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Verizon NW Response to Staff Data Request No. 524
and Supplemental Response (Confidential)

November 22, 2004

REDACTED VERSION

DATA REQUEST NO. 524:

For Verizon Northwest's Washington operations, please identify, by item description, separations category, by account number and dollar amount, all plant components other than DSLAMs that are used in the provision of DSL service.

RESPONSE: *(Filed November 4, 2004)*

The requested information has been provided in Confidential Attachment 524. The installed costs represent balances as of 10/29/2004. The separations categories for the switching and circuit accounts would be based on the frozen switching and circuit category factors provided in Attachment 268-1b.

Prepared By: Duane Simmons
Date: November 1, 2004
Witness: TBD

SUPPLEMENTAL DATA REQUEST:

1. Are the plant items listed in Confidential Attachment 524 used solely for DSL service, or used for other services too? If the data are not specific solely to DSL service, is it possible to get further data (portion of plant used, etc.) to indicate that information?
2. Is it possible to obtain the same information on Confidential Attachment 524 for the 13 month-ends of the test year? Or if data is made available on a different basis under my question 1 above, could that data be provided for the 13 month-ends of the test year?

RESPONSE: *(Filed November 9, 2004)*

1. Verizon has always intended to, and tried to, identify all DSLAM investment for placement in a separate sub-account (account 223244) for direct assignment to the interstate jurisdiction in the Part 36 separations studies. As a result of this clarifying question, the Company investigated and discovered that certain rows in Confidential Attachment 524, sub-accounts 223211 and 223221 (Excel rows 25-26 and 59-65), contain plant items that are used solely for DSL service and that should have been identified with the 223244 sub-account that was direct assigned to interstate in the test period. Verizon will correct this oversight and place these rows in sub-account 223244.
2. The COEP data base does not have a snapshot from the test period. The only time period available is the current extract.

Prepared By: Duane Simmons
Date: November 9, 2004
Witness: TBD

SUPPLEMENTAL DATA REQUEST:

1. Can information be provided for the items listed on Confidential Attachment 524 that are not 100% used for DSL, about what portion of that investment is used to support DSL service?
2.
 - a. Can the snapshot balance of what is in the 223244 sub-account as of 10/29/2004 be provided?
 - b. Can snapshot totals of accounts 221210, 223211, and 223221, as of 10/19/2004 be provided?
 - c. If a. and b. cannot be provided for 10/29/2004, can they be provided for a date as close to that as possible?

SUPPLEMENTAL RESPONSE:

1. Attached is a revised Confidential Attachment 524, which has been corrected. The numbers on the original attachment were incorrect due to an error in the query used to extract the data.

Other than the equipment previously identified in the response to the previous Supplemental Data Request and highlighted on the revised Confidential Attachment 524, the remaining equipment is used for multiple functions, not just ADSL. As a result, this equipment is not specifically identified as ADSL equipment. To determine what percentage of these items are utilized by ADSL would take special onsite studies in each central office.

2.
 - a. The 10/29/2004 balance is not available. The balance at 9/30/2004 in sub-account 223244 was \$55,638,043.
 - b. The 10/29/2004 balances are not available. The balances at 9/30/2004 in the sub-accounts requested were as follows:

221210	\$497,133,056
223211	\$ 25,253,961
223221	\$308,561,268

2.
 - c. See responses to a. and b. above.

Prepared By: Duane Simmons/Paul Roehr
Date: November 17, 2004
Witness: TBD

Confidential Attachment 524

Revised 11-17-04

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

DATA REQUEST NO. 524:

For Verizon Northwest's Washington operations, please identify, by item description, separations category, by account number and dollar amount, all plant components other than DSLAMs that are used in the provision of DSL service.

RESPONSE:

The requested information has been provided in Confidential Attachment 524. The installed costs represent balances as of 10/29/2004. The separations categories for the switching and circuit accounts would be based on the frozen switching and circuit category factors provided in Attachment 268-1b.

Prepared By: Duane Simmons

Date: November 1, 2004

Witness: TBD

Confidential Attachment 524

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