BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Continued Costing and Pricing of Unbundled Network Elements, Transport, Termination, and Resale	)))))	Docket No. UT-003013 JOINT CLEC RESPONSE TO VERIZON COMPLIANCE FILING

XO Washington, Inc., f/k/a NEXTLINK Washington, Inc. ("XO"), Electric Lightwave, Inc. ("ELI"), Advanced TelCom Group, Inc. ("ATG"), McLeodUSA Telecommunications Services, Inc. ("McLeodUSA"), and AT&T Communications of the Pacific Northwest, Inc. ("AT&T") (collectively "Joint CLECs") provide the following response to the filing of Verizon Northwest Inc. ("Verizon") in ostensible compliance with the Commission's 13th Supplemental Order.

The Joint CLECs have two concerns with Verizon's filing. First, Verizon states that its nonrecurring charges for unbundled network elements ("UNEs") and services provided for resale include the operational support system ("OSS") charges approved by the Commission. Advice No. 970, WN U-21, Section 5, Original Sheet 3 n.1; Advice No. 971, WN U-22, Section 8, Original Sheet 1 n.1. The Commission, however, approved these charges on a per local service order ("LSR") basis, not per UNE or resold service, and a single LSR can include multiple UNEs or resold services. The footnote also appears to apply to all service order charges without any attempt to explain the extent to which each charge includes OSS charges. Indeed, the sum of all of the OSS charges is almost equal to the service order charge for Non-Engineered, Subsequent Service Order. Verizon should clarify its compliance filing to establish separate rates for the

OSS charges on a per LSR basis – particularly the transition charge, which is only in effect until Verizon recovers $1.9 million. Alternatively, the filing should demonstrate how those charges are included in each Service Order Charge, as well as how such a rate structure ensures that these charges are imposed on a per LSR basis.

The Joint CLECs' second concern is with Verizon's compliance filing for collocation rates, Advice No. 970 (WN U-20). Although the cover letter indicates that the "filing revises the rate elements of Verizon's cost study that were uncontested or approved without change," the tariff pages appear to include all Verizon collocation rates. Most of those rates are marked "(R)," but the key Verizon uses in its other tariff filings indicates that "(R)" signifies a "reduction in rate." If Verizon intended to use this symbol to indicate those elements for which the Commission established prices, with or without a reduction, Verizon should do so using a different symbol. Alternatively, Verizon should use a symbol to indicate those rates subject to future modification as a result of the Commission's 13th Supplemental Order.

RESPECTFULLY SUBMITTED this 26th day of February, 2001.

DAVIS WRIGHT TREMAINE LLP
Attorneys for XO Washington, Inc., Electric Lightwave, Inc., Advanced TelCom Group, Inc., McLeodUSA Telecommunications Services, Inc., and AT&T Communications of the Pacific Northwest, Inc.

By ________________________________

Gregory J. Kopta
WSBA No. 20519