

1
2 BEFORE THE
3 WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

4 In the Matter of the Petition of) Docket No. UT- _____
5)
6 VERIZON NORTHWEST INC.)
7) MOTION FOR STAY OF
8 For Waiver of WAC 480-120-071) PROCEEDING.
9 _____
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12 Verizon Northwest Inc. (“Verizon”) files this motion to stay this proceeding until
13 the Commission completes its consideration of potential revisions to its current service
14 extension rules in its pending rulemaking docket, Docket No. UT-073014.

15 AS GROUNDS for this motion, Verizon states:

16 1. On March 29, 2007, the Commission opened Docket No. UT-073014, to consider
17 possible revisions to its extension of service rules found in WAC 480-120 and WAC 480-123.

18 2. On August 14, 2007, the Commission issued a Notice of Opportunity to File
19 Written Comments, Notice of Rulemaking Workshop and Notice of Second Rulemaking
20 Workshop (collectively “Notice”) in its rulemaking docket. The workshops are set for October 4
21 and October 17, 2007, respectively.

22 3. This waiver proceeding relates to an extension of service under the Commission’s
23 extension of service rules that are the subject matter of Docket UT-073014. Verizon has
24 estimated the cost to provide service to this applicant to be approximately \$100,000.¹

25 4. In its Notice, the Commission stated it was opening its rulemaking docket to
26 determine if the current line extension rule “provides the correct balance of obligations among

¹ As noted in its petition, a second potential customer (Ed Bush), sought service in the same area previously. However, even if two customers are applying for service in the same area, the cost would still be approximately \$50,000 per applicant.

1 customers, local service providers, and interexchange carriers” and “whether the Commission or
2 local service providers should establish limits on distance or cost to circumscribe the obligations
3 of local service providers to extend service,” among other things.

4 5. If Verizon were permitted to establish a distance or cost limit to circumscribe its
5 obligation to extend service, it would not extend service to this applicant because the distance to
6 extend service is over two miles and the cost to extend service is excessive.

7 6. It is anticipated that the Commission will provide more guidance as to the
8 circumstances under which telecommunications carriers must extend telephone service to
9 potential customers, particularly in remote areas of Washington such as that at issue in this
10 application.

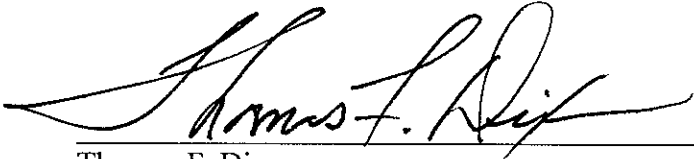
11 7. The resources of the Commission, its staff and Verizon will be more effectively
12 used by focusing on the rulemaking, rather than trying to simultaneously litigate waiver requests
13 that raise the same policy issues.

14 8. At the Commission’s open meeting held August 15, 2007, the Commission
15 considered a petition for exemption from certain line extension rule timelines for future waiver
16 petitions filed by Verizon while the Commission’s rulemaking docket was pending. At the
17 request of the Commission, Verizon withdrew its petition for exemption after it was suggested
18 by the Commission that Verizon address delaying action on specific petitions for waivers of the
19 line extension rules such as this petition on a case-by-case basis. The verified facts of this case
20 stated in Verizon’s petition clearly demonstrate that this petition is an appropriate candidate for
21 the Commission to stay action pending its final order in the pending rulemaking because of the
22 significant estimated cost to extend service to this applicant.

1 9. For the reasons stated, Verizon respectfully requests that the Commission grant
2 this Motion for Stay of Proceeding until the Commission issues a final order in Docket UT-
3 073014.

4 Respectfully submitted this 22nd day of August 2007.

5 VERIZON NORTHWEST INC.

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7 Thomas F. Dixon
8 Assistant General Counsel, Northwest Region
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