

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Joint Petition of
Verizon Communications, Inc., and MCI
Inc., For Approval of Agreement and Plan
of Merger

NO. UT-050814

PUBLIC COUNSEL ANSWER TO
INTEGRA MOTION TO COMPEL

Public Counsel supports Integra's motion to compel. Public Counsel has also issued discovery to Verizon regarding wholesale service quality. Discovery on the issue of wholesale service quality is important because it goes to the question of the level of retail service that consumers can expect after the merger, and is a means of testing assertions by the Joint Petitioners that competition will not be harmed by the merger. Competitors whose wholesale service quality suffers as a result of the merger will be in a less favorable position to compete with Verizon than under the status quo.

DATED this 1st day of August, 2005.

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