GRAHAM & DUNN PC

August 1, 2005

JUDITH A. ENDEJAN (206) 340-9694 jendejan@grahamdunn.com

VIA ELECTRONIC FILING

Ms. Carole Washburn
Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
1300 South Evergreen Park Dr. S.W.
Olympia, WA 98504-7250

Endyn.

Re: Docket No. UT-0500814

Dear Ms. Washburn:

By notice dated July 27, 2005, the Commission called for a response to Staff and Public Counsel's Joint Motion to Compel Production of Merger Savings/Synergy Models. Verizon Communications Inc. ("Verizon") has conferred with Commission Staff and Public Counsel to resolve this motion. Verizon will provide the California and Washington Synergy "Models," which are the subject of the motion to Staff and Public Counsel this week. Staff has agreed to withdraw its support for the motion. Public Counsel wishes to review the material to be provided this week by Verizon before deciding whether to withdraw its Motion to Compel in its entirety. Therefore, Public Counsel has advised Verizon that it believes oral argument on its motion this Thursday would be premature. Having satisfied Staff's requests and produced a reasonable, workable solution to Public Counsel, at this juncture Verizon would request that the August 4, 2005 oral argument on Staff and Public Counsel's Joint Motion to Compel be canceled, subject to possible further scheduling pursuant to Public Counsel's request. Thank you.

Sincerely,

GRAHAM & DUNN PC

Judith A. Endeian

Pier 70 2801 Alaskan Way ~ Suite 300 Seattle WA 98121-1128 Tel 206.624.8300 Fax 206.340.9599 www.grahamdunn.com

GRAHAM & DUNN PC

August 1, 2005 Page 2

cc:

All Parties

JAE/ned M32000-629175

DOCKET NO. UT-050814 CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon the persons and entities listed on the Service List below via email, and by depositing a copy of said document in the United States Mail, addressed as shown on said Service List, with first class postage prepaid.

Dated at Seattle, Washington this _____ day of August 2005.

Servey S. weckerson

Nancy E. Dickerson

For MCI:

Arthur Butler Ater Wynne 601 Union Street Seattle, WA 98101-2327 Fax: (206) 467-8406 Phone: (206) 623-4711

E-mail: aab@aterwynne.com

Michel Singer Nelson Senior Attorney MCI, Inc. 707 17th Street Denver, CO 80202 Fax: (303) 390-6333

Phone: (303) 390-6106

E-mail: michel.singer nelson@mci.com

Marsha A. Ward Vice President, State Regulatory MCI, Inc.

CC D

6 Concourse Parkway, Suite 600 Atlanta, GA 30328

Fax: (770) 284-5488 Phone: (770) 284-5490

E-mail: marsha.ward@mci.com

For XO Communications Services, Inc.:

Gregory J. Kopta
Davis Wright Tremaine LLP
2600 Century Square
1501 Fourth Avenue
Seattle, WA 98101-1688
Fax: (206) 628-7699
Phone: (206) 628-7692
E-mail: gregkopta@dwt.com

For Integra Telecom of WA, Inc.:

Jay Nusbaum Integra Telecom

1201 NE Lloyd Blvd., Suite 500

Portland, OR 97232 Fax: (503) 453-8221 Phone: (503) 453-8054

E-mail: jay.nusbaum@integratelecom.com

For Covad Communications Company:

Gregory T. Diamond Senior Counsel

Covad Communications Co.

7901 Lowry Blvd. Denver, CO 80230 Fax: (720) 670-3350 (Phone: (720) 670-1069

E-mail: gdiamond@covad.com

For Citizen's Utility Alliance:

John O'Rourke, Director Citizens Utility Alliance 212 W. 2nd Avenue, Suite 100 Spokane, WA 99201

Spokane, WA 99201 Fax: (509) 744-3374

Phone: (509) 744-3370, ext. 247 E-mail: <u>orourke@snapwa.org</u>

For Public Counsel:

Simon ffitch

Office of the Attorney General 900 Fourth Avenue, Suite 2000

Seattle, WA 98164
Fax: (206) 389-2079
Phone: (206) 389-2055
E-mail: simonf@atg.wa.gov

For Verizon:

Charles H. Carrathers
Vice President & General Counsel
Verizon Northwest
600 Hidden Ridge
Irving, TX 75038
Fax: (972) 718 0026

Fax: (972) 718-0936 Phone: (972) 718-2415

E-mail: chuck.carrathers@verizon.com

Sherry F. Bellamy Vice President & Assoc. General Counsel Verizon Corporate Services Corp. 1515 North Courthouse Road, Suite 500 Arlington, VA 22201

Fax: (703) 351-3655 Phone: (703) 351-3011

E-mail: sherry.f.bellamy@verizon.com

Robert P. Slevin Associate General Counsel Verizon Corporate Services Corp. 1095 Avenue of the Americas, Room 3824 New York, NY 10036 Fax: (212) 764-2739 Phone: (212) 395-6390

E-mail: robert.p.slevin@verizon.com

Andrew B. Clubok Kirkland & Ellis LLP 655 Fifteenth Street NW, Suite 1200 Washington, D.C. 20005

Fax: (202) 879-5200 Phone: (202) 879-5000

E-mail: aclubok@kirkland.com