

Exhibit No. ____ (JYR-6)
Docket No. UT-040788
Witness: Jing Y. Roth

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
JING Y. ROTH

STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

Verizon NW Response to Staff Data Request No. 406

December 15, 2004

Docket No. UT-040788 – General Rate Case
WUTC Staff Data Requests to Verizon Now. 397-409
September 23, 2004

DATA REQUEST NO. 406:

Regarding the filed direct testimony of Mr. Fulp in Exhibit No. ____ (ODF-1T) at page 11, lines 9-10, Mr. Fulp testifies in regard to basic residential service, that “market forces will not allow Verizon NW to recover loop costs from other services.”

Please:

- a) Describe in detail the specific “market forces” the witness is referring to
- b) Produce all documents referring to such “market forces.”

RESPONSE:

- a) Market forces, as stated in Mr. Fulp’s testimony, refer to the competitiveness of products and services that would constrain Verizon NW’s ability to recover loop cost in the pricing of non loop products and services, without adversely impacting Verizon NW overall revenue.
- b) No documents were utilized referring to market forces.

Prepared By: Doug Fulp
Date: September 20, 2004
Witness: Doug Fulp and Kevin Collins