

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

*In the Matter of the Joint Application of Verizon Communications Inc. and Frontier
Communications Corporation For An Order Declining to Assert Jurisdiction Over, or, in the
Alternative, Approving the Indirect Transfer of Control of Verizon Northwest Inc.*

Docket No. UT-090842

**PUBLIC COUNSEL'S SUPPLEMENTAL RESPONSE TO JOINT APPLICANTS
DATA REQUEST NO. 80**

Request No: 80
Directed to: Public Counsel
Date received: November 4, 2009
Prepared by: Sarah Shifley
Date prepared: November 12, 2009

Joint Applicants Data Request No. 80

On page 50 of Mr. Hill's testimony, he notes that "application of that condition in this jurisdiction will be \$72.4 million." Is the \$72.4 million in addition to or in lieu of the \$600 million identified above?

RESPONSE:

It is Public Counsel's understanding that the \$72.4 million referenced by Mr. Hill on page 50 of his testimony is the Washington-allocated portion of the \$600 million identified above, and thus is not in addition to the \$600 million but representative of the portion assignable to Washington. To the extent that Mr. Hill can clarify or correct Public Counsel's understanding, this response will be supplemented on the timeline described in its Response to Joint Applicants Data Request No. 54.

SUPPLEMENTAL RESPONSE (11/24/09):

Prepared by: Stephen G. Hill

The \$600 million figure is a nation-wide amount. The \$72.4 million figure is Washington-specific.