Davis Wright Tremaine LLP

ANCHORAGE   BELLEVUE   HONOLULU   LOS ANGELES   NEW YORK   PORTLAND   SAN FRANCISCO
SEATTLE   WASHINGTON, D.C.   SHANGHAI

GREGORY J. KOPTA
DIRECT: (206) 628-7692
gregkopta@dwt.com

2600 CENTURY SQUARE
1501 FOURTH AVENUE
SEATTLE, WA 98101-1688

TEL (206) 622-3150
FAX (206) 628-7699
www.dwt.com

December 3, 2003

Via Federal Express

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

      Re: Docket No. UT-023003

Dear Ms. Washburn:

AT&T Communications of the Pacific Northwest, Inc. ("AT&T") objects to the Reply of
Verizon Northwest Inc. ("Verizon") to AT&T/MCI Opposition to Verizon Motion to Strike HAI
Model ("Verizon Reply") filed in the above-referenced docket on the following grounds:

      (1)   Scope. The Notice of Opportunity to Respond to Motion to Strike ("Notice")
authorizes Verizon to file a *brief* reply to AT&T and MCI's Opposition to Verizon's Motion to
Strike HAI Model ("Opposition") pursuant to Verizon's request for "an opportunity to reply *to a
new issue* raised in AT&T and MCI's response to the motion." (Emphasis added.) The Verizon
Reply is not brief – at nine pages, it is significantly longer than AT&T and MCI's seven page
Opposition – and Verizon devotes the vast majority of its Reply to AT&T and MCI's arguments
concerning Verizon's motion, not to the new issue of disclosure of TNS information.

      (2)   Accuracy. Verizon fundamentally mischaracterizes the TNS data that AT&T and
MCI have worked with TNS to be able to make available. As AT&T and MCI stated in their
Opposition, "The *only* information that Verizon would not initially receive would be the source
code for the TNS clustering algorithms." Opposition at 6 (emphasis added). Contrary to
Verizon's misrepresentations on page 8 of its Reply, AT&T and MCI *will* provide:

      (a)   "processes used to transform Verizon NW service addresses into a list of
customer addresses ready for geocoding" – to the extent that the data
Verizon provided in discovery requires such a process, AT&T and MCI
will provide full documentation of that process;

     (b)   "the software and source code used to remove inaccurate geocoding results and geocoding results and duplicates (including the input and output files of this process)" – to the extent that Verizon has provided unreliable data, AT&T and MCI will provide full documentation of the means TNS undertakes to correct obvious errors or deficiencies in that data;

     (c)   "the software and source code used to surrogate customer locations, including the input and output files of this process" – using actual data from Verizon should minimize the need to surrogate customer locations but, again, AT&T and MCI will provide documentation of this process to the extent it is used;

     (d)   "the source code of the clustering software" – this is another name for the source code for the clustering algorithms, and as AT&T and MCI explained, this information is highly proprietary and should not be necessary to enable Verizon or any other party with a genuine desire to test the validity of the TNS process to understand, duplicate, and make proposed changes to that process; however, should that prove not to be the case, AT&T and MCI will make every effort to make this information available under appropriate restrictions;

     (e)   "the software and source code used to transform the clustering output into a format that can be read by Point Code" – again, this is the same information as the source code for the clustering algorithms; and

     (f)   "the software and source code used to chain outliers" –AT&T and MCI will provide full documentation regarding this issue.

Accordingly, if the Commission considers the Verizon Reply, AT&T requests that the Commission disregard all of the Verizon Reply except the portion that discusses the TNS data and with respect to that discussion, considers the corrections that AT&T has provided above.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta

cc: Parties of Record