

BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Review of:	)	
Unbundled Loop and Switching Rates;	)	Docket No. UT-023003
the Deaveraged Zone Rate Structure; and	)	
Unbundled Network Elements,	)	AT&T MOTION TO AMEND
Transport and Termination	)	PROTECTIVE ORDER AND FOR
(Recurring Costs)	)	EXTENSION OF TIME
_____	)	

AT&T Communications of the Pacific Northwest, Inc. (“AT&T”), hereby moves the Commission (a) to amend the protective order in this proceeding to provide appropriate protections for highly confidential information; and (b) to extend the deadline for AT&T to provide Verizon Northwest Inc. (“Verizon”) with compelled responses to Verizon’s Fourth Set of Data Requests. In support of this Motion, AT&T states as follows:

1. During the November 17, 2003, prehearing conference, Administrative Law Judge Mace ordered AT&T to provide responses to certain data requests included in Verizon’s Fourth Set of Data Requests to AT&T. Responsive information includes third party vendor-proprietary data and AT&T proprietary network information that the Commission has protected in other dockets as highly confidential data. *See, e.g.*, Triennial Review Order Proceedings, Docket No. UT-033044, Order No. 2, Protective Order (Oct. 21, 2003). Indeed, Verizon has conditioned parties’ access to comparable Verizon data on parties’ execution of a separate nondisclosure agreement that imposes a higher level of protection than the protective order issued by the Commission.

2. Accordingly, AT&T requests that the Commission amend the protective order to provide appropriate protections for the highly confidential information that AT&T is compelled to provide to Verizon. AT&T proposes that the Commission incorporate the relevant provisions from Order No. 2 in Docket No. UT-033044, specifically paragraphs 10-15 and 17-21.

3. AT&T also requests additional time to provide compelled responses to Verizon's Fourth Set of Data Requests. Particularly in light of the resources that were required to respond to the Commission Bench Requests in Docket No. UT-033044, AT&T personnel will not be able to produce the compelled data by the current deadline of December 5, 2003. AT&T reasonably believes that it will be able to produce this data by December 12, 2003. Additional response time will not prejudice Verizon when responsive testimony on the HAI Model is not due until March 26, 2004.

WHEREFORE, AT&T respectfully requests the following relief:

A. An Order from the Commission amending the protective order in this proceeding to include appropriate protections for highly confidential information; and

B. An extension of the date on which AT&T's compelled responses to Verizon's Fourth Set of Data Requests must be provided to Verizon to December 12, 2003; and

C. Such other or further relief as the Commission finds fair, just, reasonable, and sufficient.

DATED this 2nd day of December, 2003.

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Pacific Northwest, Inc.

By \_\_\_\_\_  
Gregory J. Kopta