

GNR-T-03-23



17933 N.W. Evergreen Pkwy
P.O. Box 1100
Beaverton, OR 97076

November 14, 2003

Mr. Weldon Stutzman
Deputy Attorney General
Idaho Public Utilities Commission
PO Box 83720
Boise, ID 83720-0074

Dear Mr. Stutzman:

This letter confirms that Verizon Northwest Inc. (Verizon) will not challenge at this time the FCC's presumption of impairment for unbundled mass market switching, dedicated transport, or unbundled enterprise market loops. Accordingly, Verizon will not participate as a formal party in this docket, and the Commission need not conduct discovery of Verizon or approve a batch hot cut process for Verizon as part of this proceeding.

Verizon believes that the unbundling standards set forth by the Federal Communications Commission ("FCC") are improperly restrictive, and Verizon is currently challenging these standards in proceedings before the United States Court of Appeals for the District of Columbia Circuit. In the event that the FCC's current unbundling rules are upheld by the courts, Verizon reserves the right in a subsequent proceeding to demonstrate that CLECs are in fact not impaired without access to these network elements – an approach contemplated by the FCC. See, e.g., *Triennial Review Order* ¶ 526 ("We emphasize here that the framework set forth here contemplates ongoing state review of the status of unbundled switching.").

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script that reads "Allan Thoms".

for Allan Thoms,
Vice President – Public Policy and External Affairs