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IDAHO PUBLIC
UTILITIES COMMISSION



Verizon Northwest Inc.
17933 NW Evergreen Parkway
Beaverton, Oregon 97072
Mailcode: OR030030

Fax 503 629-0592

May 18, 2005

Ms. Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, Idaho 83702

RE: GNR-T-05-1

Dear Ms. Jewell,

Verizon Northwest Inc. (Verizon) submits the following comments in Case No. GNR-T-05-1 regarding the investigation of intraLATA PIC (LPIC) change charges that are tariffed at the state level. It is Verizon's understanding that the Idaho Public Utility Commission's (Commission) intentions are to mirror the safe harbor rates of \$1.25 for electronically processed PIC changes and \$5.50 for manually processed PIC changes. If this is the Commission's intention, then Verizon does not have an objection. However, in order to avoid any additional system costs, Verizon requests that the Commission make a decision as soon as possible on whether to make these changes. Verizon is currently modifying its systems in order to implement the new FCC bifurcated rates by October 1st to meet the November 1st FCC deadline. Verizon is also modifying its FCC Tariff No. 14 to reflect the new rates. If the Commission decides to mirror the FCC safe harbor rates, then Verizon requests that it be allowed to modify its state access tariff to refer to the rates in the FCC Tariff No. 14.

Please call me at (503) 645-7909 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Renee M. Willer".

Renee M. Willer
Regulatory Manager
Verizon Northwest Inc.