

P.O. Box 9901
Vancouver, WA 98668-8701
Tel 360 905 6985
Fax 360 905 6811

jjackie.phillips@centurytel.com

Jackie Phillips
Manager- Carrier Relations



June 2, 2004

Glenn Blackmon
Washington Utilities and
Transportation Commission
1300 Evergreen Park Drive SW
Olympia, WA 98504-7250

RE: CenturyTel Interconnection Agreement Filings
Docket No. UT-043019
Docket No. UT-043021

Dear Mr. Blackmon:

You have requested that CenturyTel explain the circumstances giving rise to the timing of the filing of the interconnection agreements that are the subject of the above-referenced dockets. As Manager of Region Carrier Relations for CenturyTel these agreements fall within my responsibility.

Both the Crescomm agreement (Docket UT-043019) and the HighSpeed Communications agreement (Docket UT-043021) were executed very early on in my tenure as Manager Region Carrier Relations. During my tenure, there has been a transfer of internal responsibility for filing interconnection agreements with state utility commissions. Such filings were originally made by the CenturyTel Legal Department. I eventually took over responsibility for such filings. In hindsight, it appears that a gap occurred in the transfer of the filing responsibility.

I had for some time hoped to be in a position to inventory all executed interconnection agreements for identification and categorization. I have always given the highest priority to issues that directly and immediately affect the ability of CenturyTel's contracting parties to access CenturyTel's network and properly exchange traffic. In tending to these needs it was not until March of this year that I found an opening that allowed me to conduct the inventory of existing agreements.

It was at that time that I first became aware that the Crescomm and HighSpeed agreements had never been filed with the WUTC. Upon this revelation I immediately filed both agreements with the Commission. (At this same time and as part of this same process I discovered two agreements in Oregon that similarly had not been filed and immediately undertook to have them filed with the Oregon Commission.) These are the circumstances that gave rise to the timing of the filing of the Crescomm and HighSpeed agreements.

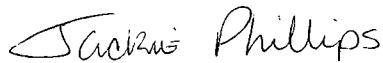
With regard to the RCC Holdings agreement (Docket UT-023061), CenturyTel did not file that agreement. That agreement was signed by CenturyTel on July 10, 2002 and was filed with the Commission by RCC Holdings. It is not unusual to have the non-ILEC party file the agreement with the state utility commission.

In summary, the circumstances causing the Crescomm and HighSpeed agreements to be late-filed are not systemic. They were a one-time consequence of a less than perfect internal transfer of filing responsibility within CenturyTel. I fully appreciate that CenturyTel is legally bound to file such agreements and understand the important role that Commission receipt and review plays in assuring that these agreements are meaningfully available for parties to opt into.

If for whatever reason any interconnection agreement is late-filed with the Commission in the future, CenturyTel commits that the circumstances giving rise to the late filing will be described in the transmittal letter accompanying the agreement.

I hope this is responsive to your request for additional information concerning these filings. I can be reached at (360) 905-6985 or jackie.phillips@centurytel.com to discuss further.

Sincerely,

A handwritten signature in cursive script that reads "Jackie Phillips".

Jackie Phillips
Manager – Carrier Relations