

Proposed Letter for Rate Comparability Certification to FCC and USAC

September 24, 2009

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445-112 12th Street, SW
Washington, DC 20554

Ms. Karen Majcher
Vice President, High Cost & Low Income Division
Universal Service Administrative Company
2000 L Street, NW, Suite 200
Washington, DC 20036

Re: CC Docket 96-45, USF Certification Pursuant to 47 C.F.R. § 54.316

Dear Ms. Dortch and Ms. Majcher:

Pursuant to 47 C.F.R. § 54.316(b) the Washington Utilities and Transportation Commission certifies it has reviewed the comparability of residential rates in rural areas of the state served by non-rural incumbent local exchange carriers (ILECs), Qwest Corporation and Verizon Northwest, Inc., to urban rates nationwide, and certifies to the Commission and the Administrator that the rates are reasonably comparable for purposes of section 254(b)(3) of the Telecommunications Act of 1996.

If you have any questions regarding this letter, please contact Jing Liu at jliu@utc.wa.gov or at (360) 664-1292.

Sincerely,

David Danner
Executive Director and Secretary