

March 10, 2000

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: Carrier-to-Carrier Service Quality Rulemaking –
Docket No. UT-990261

Dear Ms. Washburn:

These are the supplemental comments of the Washington Independent Telephone Association (WITA) in this docket. We are enclosing the original 19 copies of these comments and a diskette in WordPerfect 6.0/6.1 bearing an electronic copy of these comments. WITA continues to believe that the best approach for the development of Carrier-to-Carrier service quality standards is through collaborative processes that result in negotiated standards. That approach has been followed successfully in California, Nevada and Indiana. A rulemaking does not allow for the continued give and take that a collaborative process would encourage.

WITA has had the opportunity to review the supplemental comments of GTE Northwest Incorporated and GTE Communications Corporation. WITA is in support of those comments.

In addition, WITA continues to urge that if a rulemaking is undertaken, that a definition identifying the carriers to which the rules will apply should be included. Carrier-to-Carrier standards should not apply to rural ILECs that are not involved in interconnection. The rule proposed in the September 24, 1999 comments submitted by WITA reads as follows:

WAC 480-120-XXX Application of collocation rules. The collocation rules set forth in WAC 480-120-XXX to WAC 480-120-YYY

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shall apply to those carriers that have entered into interconnection agreements, whether by negotiation or arbitration or combination thereof, under Sections 251 and 252 of the Telecommunications Act of 1996.

Thank you for your consideration of these comments.

Sincerely,

TERRY VANN
Executive Vice President

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Enclosures as noted
cc: Parties of Record
RIA Committee Members

Wita/washburn.ltr.2