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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of

Rulemaking Concerning Telecommunications
Service (Line) Extensions (WAC 480-120 and
480-123)

Docket No. UT-073014

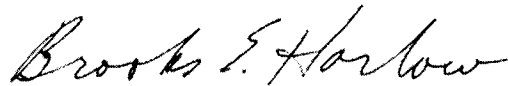
COMMENTS OF UNITED STATES
CELLULAR CORPORATION AND RCC
MINNESOTA, INC.

United States Cellular Corporation ("U.S. Cellular") and RCC Minnesota, Inc. ("RCC") support the Commission's draft rules for telecommunications service line extensions released on May 7, 2008. U.S. Cellular and RCC participated in this docket out of concern that the Commission would extend its existing line extension rule to cover wireless carriers, which currently is not the case. As U.S. Cellular and RCC explained in their previous comments in this docket, it would be discriminatory to apply the line extension rules to wireless carriers, which cannot recover line extension costs through access tariffs as wireline carriers may do. The Commission also lacks jurisdiction to extend the rules to wireless carriers.

1 2 The Commission's draft rules issued on May 7th do not require wireless carriers to
2 comply with the line extension requirements, so U.S. Cellular and RCC support the draft
3 rules.¹

4 Respectfully submitted this 6th day of June, 2008.

5 MILLER NASH LLP

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12 Attorneys for United States Cellular
13 Corporation and RCC Minnesota, Inc.

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25 ¹ The rules only apply to companies required to file tariffs, which wireless carriers do not do. *See Notice of*
26 *Opportunity Submit Comment on Draft Rules*, Docket UT-073014 (January 10, 2008).