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July 30, 2010

VIA E-FILING

David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-100562 – Additional Comments of the Washington
Independent Telecommunications Association

Dear Mr. Danner:

At the Workshop on July 27, 2010, there was a presentation by a panel of representatives of the wireless industry. While there were a number of issues that can be debated and a number of items where, from WITA's perspective, the facts are not entirely accurate, there were two statements where the facts were clearly inaccurate. The purpose of this letter is to correct the record on those two items.

First, Mr. Doumit spoke on behalf of Verizon Wireless. In his presentation he made a statement to the effect that wireless companies were building out their networks in Washington without support, using internal funds. That is a statement which has two aspects to it. Either Mr. Doumit is correct and the wireless ETCs are misusing the federal universal service support they are getting or Mr. Doumit is incorrect and wireless companies are using significant support dollars to build their networks.

The reason that Mr. Doumit's statement is in all probability in error is the large amounts of support that wireless ETCs receive. Based on USAC Report HCO1 for the third quarter of 2010, AT&T Wireless is expected to draw \$6,271,614 for the third quarter. That projects to \$25,086,456 on an annual basis. Sprint Spectrum, LP is projected to draw \$1,182,474 per quarter or \$4,729,896 for the

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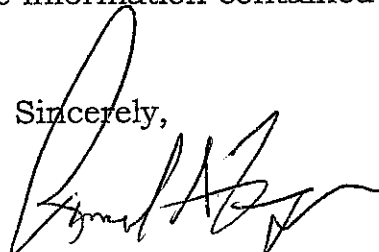
year. US Cellular is projected to draw \$1,251,213 for the quarter or \$5,004,852 for the year. These are significant sums. In fact, AT&T Wireless is by far the largest drawer of federal universal service support in the State of Washington.

It should be noted that Verizon Wireless is not designated as an ETC in Washington. However, Verizon Wireless does receive very significant federal universal service support on a national basis through its acquisition of, among others, Rural Cellular and Alltel Wireless. It should be further noted that Verizon Wireless offered as a merger condition to phase down the Alltel support over five years. In any event, Mr. Doumit's statement was not limited to either Verizon Wireless or Washington. It is incorrect to state that wireless companies are building their networks without support.

The second erroneous statement was made by Mr. Sywenki on behalf of Sprint. Mr. Sywenki stated that DSL was offered by ILECs only in response to cable modem rollouts. That is an incorrect statement as it applies to WITA's members. WITA's members were providing DSL service in their areas long before cable companies rolled out cable modem service in the urban areas. This statement may have some validity in the context of RBOC rollout of DSL. However, it has absolutely no basis in the context of the rollout of DSL by WITA's members.

If you have any questions about the information contained in this letter, please contact the undersigned.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

cc: Mr. Doumit (via e-mail)
Mr. Sywenki (via e-mail)
Clients (via e-mail)