

Qwest Corporation
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Seattle, Washington 98191

Theresa Jensen
Director- Washington Regulatory Affairs
Policy and Law

June 27, 2002

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
P. O. Box 47250
Olympia, Washington 98504-7250

Attn: Bob Shirley

Re: UT-990146 - Chapter 480-120 WAC, Telecommunications - Operations.

Dear Ms. Washburn:

Qwest Corporation ("Qwest") provides the following comments on the proposed rules in Docket No. UT-990146, Chapter 480-120 WAC, Telecommunications - Operations. Qwest appreciates the time taken by the Commission to improve upon the existing rules and supports the draft rules to the extent they clarify and better organize existing regulatory requirements. However, Qwest is very concerned with a number of the proposed April 30, 2002 rule revisions in Chapter 480-120 WAC Telecommunications -Operations. Qwest addressed many of its concerns at the March 27, 2002 open meeting and filed extensive comments on April 19, 2002. Very few of Qwest's proposed changes have been incorporated in the proposed April 30, 2002 draft. Many of the proposed rules continue to contain unreasonable provisions addressed by Qwest in its April 19, 2002 comments. Furthermore, some of the proposed rules remain technically inaccurate or unclear.

For ease of reference, the attached comments include page and line citations to the April 30, 2002 proposed, legislative format draft rules. Qwest also proposes rule language that resolves its concerns.

If you have any questions, please call me at 206-345-4726.

Very truly yours,

cc: Chairwoman Marilyn Showalter
Commissioner Patrick Oshie
Commissioner Richard Hemstad

