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October 24, 2007

Via Email and Overnight Delivery

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Re: Docket UT-061625 – Petition for AFOR
Qwest's Washington Rural Broadband Service Expansion Plan

Dear Ms. Washburn,

In Order No. 6 in Docket UT-061625, *In the Matter of the Petition Qwest Corporation for an Alternative Form of Regulation ("AFOR") pursuant to RCW 80.36.135*, the Commission finds “. . . that Qwest must expand the deployment of DSL service if the AFOR is to facilitate the “broad” deployment of advanced telecommunication service to underserved areas and customer classes.”¹ The Commission further finds “. . . that a \$ 4 million commitment level is reasonably necessary to facilitate the broad deployment of advanced service in underserved areas or among underserved customer classes as contemplated by the AFOR statute.”² Finally, the Commission requires “. . . Qwest to submit within 90 days of final approval of [the] AFOR an initial plan for Commission approval that specifies where, when, and how these funds would be expended.”³

¹ Order No. 6, ¶ 37; as referenced to *RCW 80.36.135(2)(a)*.

² Order No. 6, ¶ 39.

³ Order No. 6, ¶ 40 – The Commission also further explains in paragraph 40 that while it does not direct Qwest to include any specific projects in the proposal, it envisions that initial monies would be directed to wire centers with no DSL capability and those with less than 75 percent DSL availability.

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In compliance with these AFOR DSL expansion deployment requirements, Qwest hereby submits for Commission review and approval its *Washington Rural Broadband Service Expansion Plan*. Qwest believes that the plan satisfies all of the Commission's requirements and requests Commission approval so that Qwest can commence with plan implementation.

Sincerely,

Mark S. Reynolds

MSR/jlr
Enclosure

cc: All parties of record (*via e-mail and U.S. Mail*)