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Via E-mail and FedEx

Carole Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-060676 – Rulemaking to Consider Price List Elimination

Dear Ms. Washburn:

Pursuant to the Commission's December 15, 2006 Notice of Opportunity to File Response to Public Counsel's Comments on Proposed Rules in the above-referenced docket, AT&T Communications of the Pacific Northwest, Inc., SBC Long Distance, LLC, TCG Seattle, TCG Oregon, Integra Telecom of Washington, Inc., and XO Communications Services, Inc. (collectively "Joint CLECs") provide the following response. The Joint CLECs continue to adhere to their position as discussed in their previous comments dated August 23, 2006, which they will not repeat here. For the reasons stated in those comments, the Joint CLECs respectfully disagree with Public Counsel's statutory interpretation and rule language proposal. Rather, the Joint CLECs support the Commission Staff's latest proposed language for WAC 480-120-266 and recommend that the Commission adopt that rule as most recently proposed.

Please contact me if you have any questions about this response.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta