

October 5, 2007

*Via email and FedEx Overnight Mail*

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

RE: In the Matter of the Petition of Qwest Corporation for Commission Approval of  
Stipulation Regarding Certain Performance Indicator Definitions and Qwest  
Performance Assurance Plan Provisions  
Docket No. UT-073034

Dear Ms. Washburn:

Enclosed for filing are an original and five copies of the Initial Comments of  
Eschelon Telecom, Inc. in the above-referenced matter.

Sincerely,

Tobe L. Goldberg  
Legal & Regulatory Administrator  
Eschelon Telecom, Inc., an Integra Telecom  
Company  
612.436.6084 (Direct)  
612.436.6816 (Department fax)  
tlgoldberg@eschelon.com

cc: Attached Service List