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July 14, 2008

**VIA E-MAIL AND HAND DELIVERY**

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

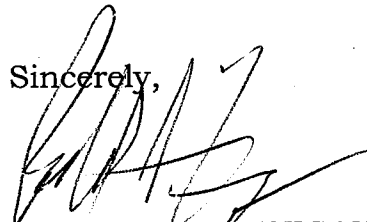
Re: Docket No. UT-073014 – Additional Comments of Industry  
Coalition

Dear Mr. Danner:

Enclosed are the Additional Comments of Industry Coalition for the above-referenced docket. The purpose of the Additional Comments is to relocate a proposed modifying clause to a location that makes the intent of the rule more apparent.

As noted before, the Industry Coalition is generally supportive of the draft rule as set out in the CR-102 Notice.

Sincerely,



RICHARD A. FINNIGAN

RAF/km  
Enclosure

cc: Clients (via e-mail)  
Tom Dixon (via e-mail)  
Mark Reynolds (via e-mail)  
Milt Doumit (via e-mail)  
Richard Potter (via e-mail)  
Brian Thomas (via e-mail)

2008 JUL 14 PM 3:44  
RECEIVED

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION**

Rulemaking Concerning  
Telecommunications Service  
Extensions (WAC 480-120-071 and  
480-103)

DOCKET NO. UT-073014

**ADDITIONAL COMMENTS OF  
INDUSTRY COALITION**

2008 JUL 16 PM 3:44

In accordance with the Notice of Extension of Time to File Written Comments, Verizon Northwest Inc., Qwest Corporation, CenturyTel of Washington, Inc., United Telephone Company of the Northwest d/b/a Embarq, TDS Telecom, Tenino Telephone Company and other member companies of the Washington Independent Telecommunications Association (collectively, the "Industry Coalition" or "Coalition") offer one additional comment. The Coalition generally supports the proposed rules and seeks only the limited clarifications set forth in its Comments filed June 6, 2008, and in these Additional Comments.

**Proposed Rule 480-120-071(4)(c):**

The Industry Coalition previously suggested modification to this draft rule. With the additional time to review, the Industry Coalition believes that the modifier it proposed in its June 6, 2008, Comments would be better located at the start of the third sentence of the subsection. The Coalition believes the revised location more clearly sets out the intent of the proposed modification.

As set forth below, we first show the proposal as filed on June 6, 2008, and then show the recommended change:

June 6 Version:

(c) **UNLESS OTHERWISE AGREED BY A COMPANY AND ITS CUSTOMER**, at the completion of the construction of the extension of service, the company must determine the difference between the estimated cost provided under subsection (2)(c)(ii) of this section and the actual cost of construction. The company must provide to the applicant detailed construction costs showing the difference. The company must refund any overpayment and may charge the applicant for reasonable additional costs up to ten percent of the estimate.


Proposed modification:

(c) At the completion of the construction of the extension of service, the company must determine the difference between the estimated cost provided under subsection (2)(c)(ii) of this section and the actual cost of construction. The company must provide to the applicant detailed construction costs showing the difference. **UNLESS OTHERWISE AGREED BY A COMPANY AND ITS CUSTOMER**, the company must refund any overpayment and may charge the applicant for reasonable additional costs up to ten percent of the estimate.

Thank you for your attention to this requested modification.

Respectfully submitted this 14th day of July, 2008.

Industry Coalition

By:   
Richard A. Finnigan  
Attorney for the Washington  
Independent Telecommunications  
Association