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January 6, 2015

VIA ELECTRONIC FILING

Mr. Steven V. King, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, Washington 98504-7250

Re: Docket No. UT-140680 - Washington Independent Telecommunications
Association Comments

Dear Mr. King:

The purpose of this letter is to provide a very brief comment on the proposed rules that are in this docket. The Washington Independent Telecommunications Association (WITA) appreciates all of the very hard work that Commission Staff has put in on the development of this set of amendments to the telecommunications rules. WITA appreciates what appears to be a very strong effort to streamline the rules and make them better adapted for modern telecommunications service.

However, there is one area where WITA must express its concern. In the rules related to universal service, the Commission may have inadvertently created a very onerous new reporting requirement. To the extent that the rules in Chapter 480-123 WAC require the company to submit a detailed budget for the next calendar year by July 1 of the prior calendar year, the Commission is creating an almost impossible requirement.

As part of the federal reporting process under FCC Form 481, WITA members will be submitting general estimate of five-year project plans. If the Commission is envisioning something different than what is in Form 481, that will be problematic. In particular, WITA is concerned about WAC 480-123-080(1) that requires a report of "the company's budgeted gross capital expenditures and maintenance expense for the coming calendar year. . . ." This language appears to impose a new requirement for submission of budgets which the Commission has, in the past, been moving away from. Detailed budgets are generally not available until very late in

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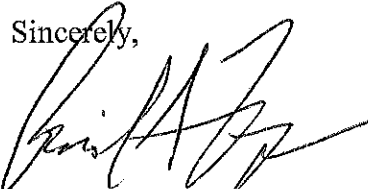
the fourth quarter of the calendar year for the next calendar year. It will be almost impossible for companies to have full budgets prepared by July 1.

Perhaps that is not the Commission's intent. Does the commission need anything beyond what is provided by FCC Form 481? If not, then the new language can be removed. If the Commission does want something more than FCC Form 481, perhaps the following language will suffice: "The report must include an estimate of the company's planned expenditures for capital construction and maintenance for the coming calendar year along with a description of the projected major projects and affected exchanges."

WITA's members will be able to provide estimates of where they expect things to move in the coming calendar year by July 1. However, final budgets are not going to be available by that date.

Again, WITA wants to congratulate Commission Staff for its work in providing major improvements to the existing telecommunications rules. However, WITA asks that the Commission consider adjusting the language in Chapter 480-123 WAC to reflect the realities of what companies are able to produce related to planned capital and maintenance expenditures so early in the year prior to those expenditures being made.

WITA's members are continuing to review the rules and if other items are identified that should be brought the Commission's attention, WITA will do so.

Sincerely,

RICHARD A. FINNIGAN

RAF/ cs

cc: Client (via e-mail)