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VIA ELECTRONIC MAIL ORIGINAL VIA FEDEX

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

Re: Collocation Rulemaking, Docket No. UT-990582

Dear Ms. Washburn:

Pursuant to the Notice of Opportunity to Submit Written Comments on Proposed Rule (September 15, 2000) in the above-referenced docket, Advanced TelCom Group, Inc., AT&T Communications of the Pacific Northwest, Inc., TCG Seattle, Electric Lightwave, Inc., NEXTLINK Washington, Inc., and WorldCom, Inc. (collectively "Joint Commenters"), provide the following comments.

The Joint Commenters support Commission adoption of the Proposed Rule. The Proposed Rule is consistent with FCC requirements and with the Commission's prior decision on collocation issues in Docket Nos. UT-960323, *et al.* The Proposed Rule would establish uniform procedural requirements for processing CLEC requests for collocation, including appropriate procedures for addressing denial of such requests.

The Joint Commenters, however, are concerned that the Proposed Rule does not address additional issues that were discussed during the rulemaking process, including CLEC to CLEC cross-connection, equipment to be collocated in ILEC central offices, security, and loop availability data. These issues significantly impact competitors' ability to make efficient use of collocation for access to, and interconnection with, ILEC networks. Even when ILECs represent that they will make such collocation available, those representations often ring hollow. A Qwest witness, for example, recently testified in hearings conducted in Docket No. UT-003013 (Part A) that Qwest would permit CLEC to CLEC cross-connections in its central offices, but Qwest has denied NEXTLINK's requests for such cross-connections, allegedly pending development of an appropriate "product" that is expected to take several weeks.

The Joint Commenters recognize that the FCC is reviewing many collocation issues on remand from the

D.C. Circuit decision vacating some of the FCC's collocation rules. The Joint Commenters would prefer that this Commission establish appropriate collocation rules now, rather than awaiting the outcome of the FCC proceedings, but they do not want "better" to be the enemy of "good." Accordingly, the Joint Commenters urge the Commission to adopt the Proposed Rule in its current form and to consider additional collocation rules in a future proceeding. In addition, the Commission should make clear in its order adopting the Proposed Rule that the rule represents the *minimum* standards for collocation and more demanding standards that have been negotiated or arbitrated and that are contained in individual carrier interconnection agreements would continue to govern ILEC performance.

The Joint CLECs appreciate the opportunity to comment on the Proposed Rule. Please contact me if you have any questions about these comments or need additional information.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta

cc: Rex Knowles
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