

**Miller Nash LLP**  
4400 Two Union Square  
601 Union Street  
Seattle, WA 98101-2352  
(206) 622-8484  
(206) 622-7485 fax

3500 U.S. Bancorp Tower  
111 S.W. Fifth Avenue  
Portland, OR 97204-3699  
(503) 224-5858  
(503) 224-0155 fax

1100 Riverview Tower  
900 Washington Street  
Post Office Box 694  
Vancouver, WA 98666-0694  
(360) 699-4771  
(360) 694-6413 fax

**Brooks E. Harlow**  
harlow@millernash.com

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**VIA FACSIMILE AND U.S. MAIL**

Ms. Carole J. Washburn  
Executive Secretary  
Washington Utilities and Transportation Commission  
Post Office Box 47250  
Olympia, Washington 98504-7250

Subject: Docket No. UT-003013, Part D Comments of Covad Communications Re Staff  
Request To Deaverage

Dear Ms. Washburn:

This letter responds to the request of the Administrative Law Judge in this docket, Larry Berg, to respond in writing to a request by Commission Staff raised at the pre-hearing conference on Monday, September 24, 2001. We file this response on behalf of our client, Covad Communications ("Covad").

Covad concurs in and supports the comments filed this date by WorldCom, Inc. Specifically, Covad supports Staff's request to further deaverage. Additionally, Covad supports WorldCom's request and recommendation that the Commission revisit unbundled network element recurring rates using current technologies and updated cost models. As a data CLEC or "DLEC" Covad's primary interest is in the costing and pricing of the loop. Based on the HAI version 5.0a results set forth in WorldCom's letter, Qwest's current Washington loop rates may be in excess of 50% too high. Such a substantial overstatement of costs and the resulting overcharge for loops creates a substantial barrier to competitive entry in Washington.

Covad respectfully urges the Commission to revisit recurring UNE loop rates as requested by WorldCom.

Very truly yours,

Brooks E. Harlow

cc: All Parties of Record