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Public Policy

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

Re: Qwest's 2nd Notice to Wireless and Paging Type 1 and Type 2 Interconnection Customers, requesting interconnection negotiations and implementing interim arrangements for rates, terms and conditions in conjunction with FCC Docket No. 01-92

Dear Ms. Washburn:

This letter is a follow-up letter to my letter of May 4, 2005 in which I advised you that Qwest had provided notice to Wireless and Paging Type 1 and Type 2 Interconnection Customers, requesting interconnection agreement negotiations. A copy of my May 4, 2005 letter to you is attached and labeled Attachment 1 for your convenience.

This letter is to advise you that Qwest has provided an additional notice to Wireless and Paging Type 1 and Type 2 Interconnection Customers, renewing its request for interconnection negotiations.

On February 24, 2005, the Federal Communications Commission (FCC) issued its decision *In the Matter of Developing a Unified Intercarrier Compensation Regime T-Mobile et al. Petition for Declaratory Ruling regarding Incumbent LEC Wireless Termination Tariffs*, CC Docket No. 01-92. In its Order, the FCC amended its rules to prohibit LECs from imposing compensation obligations for non-access CMRS traffic pursuant to tariff and to make clear that an incumbent LEC may request interconnection from a CMRS provider and invoke the negotiation and arbitration procedures set forth in section 252 of the 1996 Telecommunications Act. The Order further provides that existing wireless termination tariffs shall no longer apply upon the effective date of the amended rules and establishes interim compensation requirements under C.F.R. 20.11

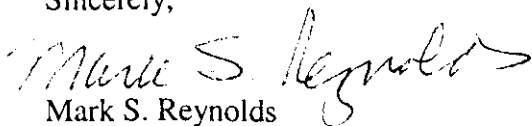
that apply while interconnection arrangements are established. The rules became effective April 29, 2005.

As disclosed to the Commission previously, pursuant to the FCC's direction, Qwest sent a letter establishing interim rates applicable under rule 20.11. In the absence of direction by the FCC on terms and conditions that apply to the rates, Qwest proposed that the previously submitted interconnection agreement terms and conditions apply during the pendency of any negotiations. The proposed Agreement aligned pricing with the state commission implemented or approved rate elements pursuant to 47 C.F.R. 51.715. Qwest continued to offer interconnection services according to the terms and conditions of the interim arrangements during the time period for negotiation. The vast majority of these carriers did not reply to Qwest's request and did not engage in negotiations at all for a permanent interconnection agreement.

Prior to the expiration of the interim arrangements under the terms of 47 C.F.R. §51.715, Qwest sent the letter attached and labeled Attachment 2 to those customers who have not negotiated permanent agreements. The letter reestablishes the interim arrangements and permits the customers to continue to receive existing services without disruption. Should the customers continue to refuse to negotiate with Qwest for a permanent agreement, Qwest will either seek mediation and/or arbitration with the Commission or seek to discontinue offering interconnection services under the interim arrangements. Qwest will otherwise continue to offer the interim arrangements according to 47 C.F.R. §51.715 until those arrangements expire according to the rule.

Please feel free to contact me if you have any questions.

Sincerely,


Mark S. Reynolds

MSR/llw
Enclosures