

"Tony Ray" <tony@turbonet.com>

08/23/2006 03:38 PM

To: <dreygold@wutc.wa.gov>
Cc: <monica@turbonet.com>
Subject: Docket UT-063053, Late-filed

Dear Ms. Reynolds,

This is in response to a letter dated August 21, 2006 signed by Carole J. Washburn regarding late filing of an Interconnection Agreement with Verizon Northwest, Inc.

The Agreement was signed at my request by our President, Monica L. Ray, on February 17, 2006 and sent to Verizon that same day. The Agreement was Verizon's Model Interconnection Agreement. Verizon informed me about a month later that there would be an amended rate schedule and it was delaying their completing the Agreement. In mid-June, Verizon called again and asked me if I would like them to email me the new rate schedule which they did. They also asked if I wanted to use the old signature page or resign the agreement. Not wanting to delay things further (four months had already passed) I told Verizon to go ahead and use the old signature page which they signed June 22, 2006.

Verizon sent us a printed, signed copy of the agreement with a cover letter dated June 30, 2006 and it appears the Interconnection Agreement was filed July 11, 2006 according to Ms. Washburn's letter.

If it helps, I do not believe an agreement is valid until "both" parties have signed. We could not file the document within 30 days after we signed because Verizon had not yet signed the Agreement. Similarly, Verizon could not file it until they had signed. The document was filed 20 days after it was signed by "both" parties; that is, it contained both signatures June 22, 2006 and not before. Consequently, I do not believe it was filed late.

I hope this clarifies the circumstances surrounding the document's filing. Please let me know if I can answer any further questions.

Craig A. Ray (Tony)
VP Cactus International, Inc.
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