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June 20, 2002

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: In re the Petition of the Washington Independent Telephone Association for Declaratory Order on the Use of Virtual NPA/NXX Calling Patterns; Docket No. UT-020667

Dear Ms. Washburn:

Pursuant to the June 7, 2002 Notice issued in the above-noted docket, enclosed for filing are Level 3 Communications, LLC ("Level 3") comments on the Washington Independent Telephone Association Petition for Declaratory Order. In addition to the original, 19 copies of the comments are included; also included is a disk containing Level 3's comments in electronic format.

If there are any questions concerning the filing, please contact the undersigned.

Sincerely,

Rogelio E. Peña

cc: Terrence Stapleton
Richard Finnigan
Brooks Harlow, ICG Telecom Group, Inc.