

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale	DOCKET NO. UT-960369
In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for U S WEST COMMUNICATIONS, INC.	DOCKET NO. UT-960370
In the Matter of the Pricing Proceeding for Interconnection, Unbundled Elements, Transport and Termination, and Resale for GTE NORTHWEST INCORPORATED	DOCKET NO. UT-960371
	COMMENT OF PUBLIC COUNSEL RE PETITION FOR RECONSIDERATION

The Public Counsel section of the Washington Attorney General respectfully submits these comments in response to the Commission's Call for Answers of September 27, 2000. Public Counsel supports the petition for reconsideration or rehearing of the statewide average loop price established for Qwest in this docket for the reasons set forth in the petition. Public Counsel shares the concerns stated by the Joint Petitioners regarding the methodology used, the lack of record support, and the competitive impact of the loop rate ultimately adopted.

DATED this 11th day of October, 2000

CHRISTINE O. GREGOIRE
Attorney General

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Assistant Attorney General
Public Counsel

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