



January 4, 2007

Ms. Carole J. Washburn
Executive Secretary
WA Utilities & Transportation Commission
1400 S. Evergreen Park Drive S.W.
P.O. Box 40128
Olympia, WA 98504-0128

*Via Email to: records@wutc.wa.gov
and USPS*

Re: DOCKET NO. UT-061443, IN THE MATTER OF THE PETITION OF ESCHELON TELECOM OF WASHINGTON, INC. FOR APPROVAL OF AN ALTERNATIVE MEASUREMENT OF SERVICE QUALITY REPORTING PURSUANT TO WAC 480-120-439(12)

Dear Ms. Washburn:

Commission Staff has requested additional information and/or clarification of issues raised in the above noted petition of Eschelon Telecom of Washington, Inc. (Eschelon). Eschelon responses to Staff's concerns are provided below.

WAC 480-120-439(3) – Missed Appointment Report

Eschelon has requested a permanent waiver of this reporting requirement because it must rely on incumbent LEC dispatches to install or repair services to the customer's demarcation point or network interface unit (NIU). In those circumstances where Eschelon needs Qwest to send a technician to install new service, Eschelon will submit a request to Qwest to reserve an appointment through the Qwest IMA system. Qwest will then provide Eschelon with an appointment confirmation that includes the date, estimated start time, duration and completion times. At this point, Eschelon has no further control over the appointment other than to cancel or reschedule the appointment. Throughout this process, Eschelon works with its customer to set appropriate expectations and commitments. The repair process is similar when Eschelon must rely on the underlying carrier for the repair dispatch. Eschelon submits repair tickets through Qwest's CEMR system and Qwest provides the estimated appointment time, which is then communicated by Eschelon to its customer.

While Eschelon has limited ability to track or monitor these appointments through Qwest's systems, the appointment data and/or results reside only in Qwest's systems and cannot be reported in the aggregate by Eschelon without significant modifications to its own processes and systems. Those modifications would include, but may not be limited to, development and training of new, manual, data input processes and system modifications and special reporting protocol. Eschelon believes that the costs of implementing such a process far outweigh any potential benefits.

WUTC Docket No. UT-061443
January 4, 2007
Page 2

WAC 480-120-439(7) and (8) – Switching Report and Interoffice, Intercompany and Interexchange Trunk Blocking Report

Eschelon does not provide direct trunking services to interexchange carriers and thus would not have anything to report for this category. The Company does monitor all other switching and trunking performance, including 911 and local trunking arrangements. The enclosed, revised, proposed reporting template shows that Eschelon will report monthly even if only to confirm that performance standards have been met.

WAC 480-120-439(9) – Repair Report

The enclosed revised, proposed, reporting template shows how Eschelon will account for the exclusions to reported troubles.

I am submitting this original and as well as filing the material electronically with the Commission's Records Center. Please contact the undersigned with any questions or concerns.

Sincerely,

Cathy Murray
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 900
Minneapolis, MN 55402-2456
(612) 436-1632 (direct)
(612) 436-6816 (department fax)
camurray@eschelon.com

Enclosure

Cc: Kristin Russell, WUTC