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November 2, 2009

VIA E-MAIL AND HAND DELIVERY

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. A-091124 – Comments of the Washington Independent
Telecommunications Association

Dear Mr. Danner:

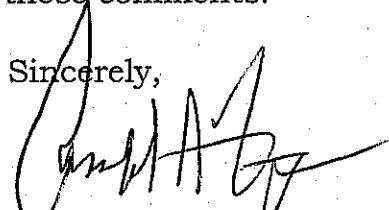
On behalf of the Washington Independent Telecommunications Association (WITA), I have reviewed the proposed changes under this docket that would revise adoption-by-reference dates.

WITA notes that there appears to be an anomaly concerning the dates as they relate to the adoption of Title 47 Code of Federal Regulations. In WAC 480-120-999(4), the bulk of the federal regulations are adopted-by-reference as those rules existed on October 1, 1998. However, for the adoption-by-reference for the CPNI rules in WAC 480-120-999(5), the Commission adopts the version in effect on October 1, 2008. Why would the Commission want the most current version of the CPNI rules, and a decade old version of the remainder of the rules? WITA suggests that the date for both rules in Subsections (4) and (5) be modified to be October 1, 2009.

David Danner
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Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Finnigan', written over the word 'Sincerely,'.

RICHARD A. FINNIGAN

RAF/km

cc: Client