February 19, 2002

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

  Re: Docket Nos. UT-003022 and UT-003040 – Workshop #4

Dear Ms. Washburn:

On February 19, 2002, Qwest informed the Commission that it had provided proposed

language for Washington SGAT Section 9.4.1.1 (packet switching) to Covad in

connection with the filing of its updated SGAT in Colorado.   For your convenience,

Covad sets forth below Qwest's proposed language for SGAT Section 9.4.1.1:

> 9.4.1.1.   To the extent additional Line Sharing technologies and
> transport mechanisms are Technically Feasible, Qwest will allow
> CLECs to line share in that manner, provided, however, that (i) the
> rates, terms and conditions for Line Sharing may need to be
> amended and (ii) if Qwest demonstrates that such Line Sharing
> method is not Technically Feasible, Qwest need not afford the
> access identified.

Please be advised that Covad does not agree with that proposed language, and believes

that the more appropriate language for SGAT Section 9.4.1.1 is that contained in Covad's

Comments on the Twentieth Supplemental Order; Initial Order on Workshop 4 Issues,

filed with the Commission on December 13, 2002. For your convenience, Covad sets

forth below the language Covad proposed in its Comments:

9.4.1.1. The FCC had declared that Line Sharing applies to the entire Loop (even where Qwest has deployed fiber or digital loop carrier). To the extent line sharing over fiber is demonstrated to be technically feasible pursuant to any method specified by applicable FCC Rules, Qwest will allow CLECs to line share in that same manner, provided, however, that the rates, terms and conditions for line sharing may need to be amended in order to provide such access. Separate and apart from any technically feasible method by which CLECs may line share over fiber as referenced above, Qwest also will provide CLECs with network elements to transport data from Qwest remote terminals including unbundled Dark Fiber, DS1 capable loop, and OCn; and the ability to commingle data with Qwest's pursuant to Section 9.20 (unbundled packet switching).

Thank you.

Very truly yours,

K. Megan Doberneck

cc: Service List (*via e-mail and U.S. Mail*)