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## VIA FEDEX

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

Re: Qwest Section 271 Compliance/SGAT Review, Docket Nos. UT-003022 & UT-003040

Dear Ms. Washburn:

Pursuant to the Notice of Extension of Time to File Comments (September 14, 2000) in the above-referenced dockets, NEXTLINK Washington, Inc., Electric Lightwave, Inc., and Advanced TelCom Group, Inc. (collectively "Joint CLECs") provide the following comments on the Revised Initial Draft Order ("Order"). The Joint CLECs support Commission adoption of the Order in its current form. The Order accurately reflects the evidence presented and the parties' discussion with respect to the issues on which the Joint CLECs took a position, and the Order resolves those issues consistent with federal law and prior Commission decisions. The Joint CLECs appreciate Staff's thorough and extensive analysis, and recommend that the Commission adopt the Order.



Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta

cc: Service List