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October 30, 2000

VIA FACSIMILE

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
Post Office Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

Subject: Docket No. UT-000883
Response to Qwest/Staff Joint Recommendation

Dear Ms. Washburn:

This letter responds to Ms. Anderl's letter dated October 23, 2000 regarding the joint Qwest/Staff recommendation to conduct this proceeding on a paper record. Advanced TelCom, Inc. ("ATG") and MetroNet Services Corporation ("MetroNet") strongly oppose this recommendation. ATG and MetroNet believe that Qwest has failed to meet its burden of proof in this docket. Cross-Examination will help the Commission to understand the serious shortcomings in the Qwest case as well as the significant risks to the development of true effective competition that are inherent in the Qwest petition.

ATG and MetroNet in no way wish to diminish the value of the resources that a two to four day hearing and this Docket could consume. It is important to recognize, however, this is potentially the broadest and more far reaching competitive classification case the company has ever filed. Moreover, it is the first case seeking a broad competitive classification of basic voice-grade switched local service. A case with this potential impact on the development of competition as well as the rates to be paid by telephone users is not one that should be given short shrift.

With regard to the joint recommendations regarding hearing scheduling, ATG and MetroNet are open to the possibility of shortening the hearing schedule somewhat. However, ATG and MetroNet recommend that this issue be taken up at the prehearing conference on October 25, after the parties have submitted their cross estimates. ATG and MetroNet do not want to release hard-to-schedule hearing days until it is certain that they will not be needed.

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ATG and MetroNet are amendable to Dr. Taylor testifying on November 2, 2000. Mr. Wood is, likewise, only available on November 2, due to a commitment to testify in Wyoming earlier in the week. Based upon preliminary cross-estimates, it appears that Dr. Taylor can be concluded in the morning and Mr. Wood can be concluded in the afternoon.

MetroNet and ATG are willing to waive cross-examination of Ms. Anderson and Messrs. Hooks and Davis in order to facilitate Qwest's stipulation with other parties and to minimize hearing time.

Very truly yours,

Brooks E. Harlow
Attorneys for ATG and MetroNet

cc: ALJ Karen Caille
All Parties of Record (via facsimile)

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