

**Proposed Letter for Rate Comparability Certification to FCC and USAC**

September 20, 2010

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Ms. Karen Majcher  
Vice President, High Cost & Low Income Division  
Universal Service Administrative Company  
2000 L Street, NW, Suite 200  
Washington, DC 20036

**Re: CC Docket 96-45, USF Certification Pursuant to 47 C.F.R. § 54.316**

Dear Ms. Dortch and Ms. Majcher:

Pursuant to 47 C.F.R. § 54.316(b), the Washington Utilities and Transportation Commission certifies it has reviewed the comparability of residential rates in rural areas of the state served by non-rural incumbent local exchange carriers (ILECs), Qwest Corporation and Verizon Northwest, Inc., to urban rates nationwide, and certifies to the Commission and the Administrator that the rates are reasonably comparable for purposes of section 254(b)(3) of the Telecommunications Act of 1996.

If you have any questions regarding this letter, please contact Jing Liu at [jliu@utc.wa.gov](mailto:jliu@utc.wa.gov) or at (360) 664-1292.

Sincerely,

David Danner  
Executive Director and Secretary