



Bob Ferguson
ATTORNEY GENERAL OF WASHINGTON

800 Fifth Avenue #2000 • Seattle WA 98104-3188

December 7, 2018

SENT VIA UTC WEB PORTAL

Mr. Mark L. Johnson
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P. O. Box 47250
Olympia, WA 98504-7250

Re: Rulemaking to Consider Possible Changes to Rules in Chapter 480-120 WAC,
Relating to Service Obligations of Telephone Companies,
Docket UT-180831

Dear Mr. Johnson:

Pursuant to the Commission's October 22, 2018, Notice of Opportunity to Submit Written Comments, please find enclosed the Comments of Public Counsel for filing in the above-entitled docket. Public Counsel retained the expert services of Susan M. Baldwin for the preparation of these comments.

If you have any questions, or would like to discuss these comments, please contact Nina Suetake at NinaS@atg.wa.gov or (206) 389-2055, or Sarah Laycock at SarahL2@atg.wa.gov or (206) 389-3879.

Sincerely,

NINA SUETAKE
WSBA No. 53374
Assistant Attorney General
Public Counsel Unit
(206) 389-2055

NS/lec

Received
Records Management
12/07/18 13:01
State Of WASH.
UTIL. AND TRANSP.
COMMISSION