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May 10, 2005

By E-Mail and Federal Express

Ms. Carole J. Washburn  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504

Re: AT&T Amended Petition for Alternative Measures/Reporting, Docket No. UT-041588

Dear Ms. Washburn:

AT&T Communications of the Pacific Northwest, Inc. (AT&T PNW) and TCG Seattle and TCG Oregon ("TCG") (collectively "AT&T") has continued to work with Commission Staff, and as a result, AT&T supplements its Amended Petition in the above-referenced docket as follows:

- With respect to WAC 480-120-439(9), both AT&T PNW and TCG can report the 48 hour and 72 hour measures as the rule provides, and the form service report should be revised so that the TCG report under this subsection is the same as the AT&T PNW report;
- AT&T PNW's systems do not track any of the exclusions specified in the rule, not just the exclusions under WAC 480-120-439(3), so the same notation made in that section should be included in all other subsections that specify reporting exclusions;
- AT&T proposes to provide separate reports for TCG and AT&T PNW because different systems are used to track each company's performance and the data cannot easily be combined, and because AT&T PNW and TCG provision service differently and serve different types of customers and thus separate reports provide a more accurate picture of the company's overall performance; and

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- The TCG entities are combined into a single TCG report because the TCG systems measure the performance of all TCG entities and because the TCG entities provide service the same way and to the same types of customers.

Please contact me if you have any questions about this supplemental information.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta