

May 25, 2000

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-990146 – Comments of the Washington
Independent Telephone Association

Dear Ms. Washburn:

This letter will constitute the comments of the Washington Independent Telephone Association ("WITA") concerning the proposed rulemaking in the above-referenced docket. As requested in the Opportunity to Submit Written Comments, I am enclosing ten copies of these written comments. A separate set of comments have been provided by e-mail.

These comments will address the specific questions related to access charges and imputation as requested by Commission Staff at the last workshop.

The proposed changes to WAC 480-120-X11 (currently WAC 480-80-047) appear to be appropriate. WITA suggests that the reference in subsection (2) be clarified by stating "all Class A companies" This clarification appears to be consistent with the intent of the revisions.

WITA recommends that WAC 480-120-X12 (currently WAC 480-80-048) be retained as written. The language contained in that rule is necessary to allow WECA to continue to function, even under the new proposal submitted by WECA on March 1, 2000.

WITA recommends that the current WAC 480-120-025(3) be repealed and not adopted as WAC 480-120-X09. The Commission's authority to order refunds is contained in statute. The rule language adds nothing to that authority. It should be repealed as unnecessary language.

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WITA requests that the Commission not adopt WAC 480-120-X19 dealing with imputation as proposed by NEXTLINK. That issue should be addressed in a separate rulemaking, if at all. It is not appropriate for introduction into this rulemaking at this time. In addition, the rule, as proposed, does not distinguish among those companies that must offer unbundled network elements and the rural companies that are currently exempt from that requirement. Imposing imputation requirements on small, rural companies at this time would be burdensome and unnecessary. Finally, as the proposed rule would affect GTE Northwest, the imputation issue is far too complex to be joined into this already overly complex rulemaking.

Sincerely,

TERRY VANN

RAF/nar
Enclosures

cc: Richard A. Finnigan (*w/encl.*)
RIA Committee Members (*w/encl.*)