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May 2, 2006

**VIA FEDERAL EXPRESS &
ELECTRONIC MAIL**

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-053021 - Comments of Rural Cellular Corporation and United States Cellular Corporation

Dear Ms. Washburn:

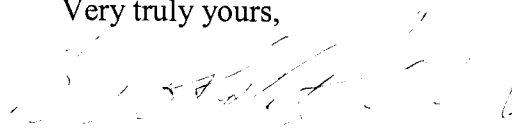
Rural Cellular Corporation (“RCC”) and United States Cellular Corporation (“USCC”) welcome the opportunity to comment on the proposed rules issued in this docket on April 3, 2006. RCC and USCC applaud the Commission and its Staff for crafting an excellent set of rules in response to the FCC’s order inviting states to adopt a similar approach to the FCC. See *In the Matter of Federal-State Joint Ward on Universal Service*, Report and Order, CC Docket No. 96-45, FCC 05-46 (released March 17, 2005) (“*ETC Report and Order*”). RCC and USCC strongly support adoption of the rules as currently proposed. In support of the specific proposed rule provisions, RCC and USCC refer to and incorporate their prior comments in this docket, to the extent the proposed rules are consistent with those comments.

This Commission’s proposed rules will, if adopted, implement at the state level the best features of the *ETC Report and Order*. The new rules will benefit the public interest by helping to ensure that ETCs are using Federal Universal Service Funds for their intended purposes. In particular, this Commission will be in a much better position to ensure that all ETCs, not just competitive ETCs, will be held accountable for their use of funds by requiring all ETCs to report on all types of support. In so doing, the Commission is not imposing any undue or unreasonable burdens on ETCs. Nor has this Commission done anything that would erect barriers to entry or to qualification or ETC status. Instead, the Commission has carefully crafted rules that strike an appropriate balance between the need for accountability versus creating undue and unnecessary burdens on ETCs.

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RCC and USCC have participated in workshops and commented extensively in this docket since it was opened last year. While not all of their suggestions were adopted or incorporated, RCC and USCC oppose any further changes in the proposed rules. Overall, RCC and USCC believe the rules can fairly be called "excellent." As noted, the Commission has successfully walked a fine line in crafting the proposed rules. Accordingly, RCC and USCC urge the Commission to adopt the proposed rules without change and without further delay.

Very truly yours,



Brooks E. Harlow

cc: Mr. David A. LaFuria