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May 3, 2006

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: Comments of United Telephone Company of the Northwest
Docket No. UT-053021

Dear Ms. Washburn:

These comments are submitted on behalf of United Telephone Company of the Northwest ("United"), in response to the Commission's April 3, 2006 Notice of Opportunity to Submit Written Comments. United has previously filed comments (June 1, 2005 and November 14, 2005) in this docket and appreciates the extent to which the Commission has taken our comments and those of others in the industry into consideration. We note particularly the proposed changes to the advertising certification which are more reasonable and adaptable to the media outlets available in rural areas.

United believes there remains one item in the proposed draft that would benefit from some clarification. The draft rules authorize the Commission to deny, revoke, suspend or modify an ETC's designation. The rules provide:

WAC 480-123-0040 – Revocation of Eligible Telecommunications Carrier Designation. ~~The Commission may modify, suspend, or revoke the designation of an ETC if it determines that the ETC is not in compliance with its designation order or this chapter, or is not operating in a manner that is consistent with the public interest.~~ Subject to notice and an opportunity to be heard, the commission may decline to grant annual certification, and may revoke, suspend, or modify a designation granted previously if it determines that the ETC has failed to comply with the requirements of section 47 U.S.C. Sec. 214(e) or any other conditions imposed by the commission.

United appreciates the inclusion of language to require notice and opportunity for hearing; however, United agrees with the other commentors that the rule should be more specific about what behavior could result in revocation, suspension or modification of ETC

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designation. Specifically, do "any other conditions" refer strictly to conditions that would be placed on the ETC in the certification order?

United appreciates the opportunity to file these comments.

Sincerely,

A handwritten signature in cursive script that reads "Nancy L. Judy".

Nancy L. Judy