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November 19, 2008

Via Overnight Delivery

David W. Danner
Executive Director & Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

Re: *Comcast Phone of Washington, LLC and Lewis River Telephone Company, D/B/A TDS Telecom; Docket No. UT-083056*

Dear Mr. Danner:

Per our correspondence to you dated November 17, 2008, enclosed is the original executed declaration of Beth Choroser.

Thank you.

Very truly yours,

Davis Wright Tremaine LLP

Mary A. Scarsorie
Assistant to Gregory J. Kopta

Enclosures

cc: Richard A. Finnigan (w/o enclosure)

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WASHINGTON STATE

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the)
)
 Washington Independent Telecommunications) DOCKET NO. UT-083056
 Association and Lewis River Telephone Company,)
 d/b/a TDS Telecom Petition for Declaratory Ruling)
)
)

COMMONWEALTH OF PENNSYLVANIA)
) ss
 COUNTY OF PHILADELPHIA)

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 DIVISION

My name is Beth Choroser. I am of sound mind, am capable of making this affidavit, am over eighteen (18) years of age, and am fully competent to testify to the matters stated herein. I have personal knowledge of each of the facts stated herein, and each is true and correct.

1. I am Senior Director of Regulatory Compliance for Comcast Cable Communications. My business address is One Comcast Center, 50th Floor, Philadelphia, PA 19103.
2. I am responsible for a wide variety of regulatory matters for various Comcast Cable Communications affiliates, including Comcast Phone of Washington, LLC (“Comcast”) as well as the Comcast affiliates responsible for providing interconnected voice over Internet protocol (“VoIP”) services in Washington. My responsibilities include ensuring compliance with both state and federal regulatory requirements. More specifically for purposes of this docket, I negotiate interconnection agreements with incumbent local exchange carriers (“ILECs”) consistent with Section 251 of the federal Telecommunications Act of 1996 (“Act”) for Comcast and its affiliates around the country.
3. The Commission has registered and authorized Comcast to provide intrastate telecommunications services as a competitively classified company. Comcast offers various telecommunications services to the public, including both telephone exchange and exchange access service offerings. Comcast provides wholesale telecommunications services to its affiliate, Comcast IP Phone II (“Comcast IP”), which in turn provides interconnected VoIP services to thousands of customers in Washington. The Commission has approved Section 251 interconnection agreements between Comcast and seven other ILECs in Washington, including Qwest Corporation, Verizon Northwest, Inc., United Telephone Company of the Northwest d/b/a Embarq, YCOM Networks, Inc. d/b/a FairPoint Communications, and three CenturyTel entities (CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc. and CenturyTel of Cowiche, Inc.).
4. I have directly conducted or supervised all of the interconnection agreement negotiations between Comcast and its competitive local exchange carrier (“CLEC”) affiliates in other

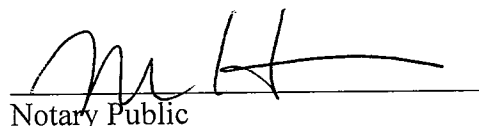
states and TDS Telecom, including the TDS affiliate in Washington (Lewis River Telephone Company, d/b/a TDS Telecom ("TDS")). Through these negotiations, which began in April 2008, Comcast and TDS resolved all of the technical issues associated with establishing an interconnection agreement. Just within the last month, however, after all terms and conditions of the agreement were resolved, TDS announced that it questions whether Comcast qualifies as telecommunications carrier entitled to interconnection under Section 251 of the Act. Based on this position, TDS' Michigan affiliate initiated an interconnection arbitration against Comcast at the Michigan Public Service Commission seeking effectively the same anticompetitive result that that TDS seeks here.

5. On November 3, 2008, Comcast filed a petition for arbitration with TDS seeking Commission resolution of this one disputed issue. No further negotiations are necessary or contemplated by the parties to establish an interconnection agreement between Comcast and TDS.
6. A declaratory order stating that Comcast is not a telecommunications carrier with corresponding interconnection and related rights under the Act would substantially prejudice Comcast. Comcast relies on its status as a telecommunications carrier to negotiate, and if necessary arbitrate, interconnection agreements with the ILECs in Washington. If Comcast is denied these rights, Comcast might not be able to interconnect its network with ILECs' networks and exchange traffic. Comcast's inability to interconnect with the ILECs under Section 251 would severely hamper, and could preclude, Comcast's ability to provide the services it offers in Washington.
7. Through Comcast's Local Interconnection Service offering, a publicly available telecommunications service offered to qualified providers of interconnected VoIP services, Comcast IP relies on Comcast to provide connectivity between Comcast IP's customers and the public switched telephone network ("PSTN"), including local and long-distance calling capabilities. Comcast IP also relies on Comcast to provide it with access to numbering resources to issue to end users, number portability, emergency ("E911") calling and other essential telecommunications services. If Comcast is unable to obtain interconnection with ILECs, Comcast IP would be severely hampered in its ability to provide competitive voice telephony services to its customers.

This concludes my statement.


Beth Choroser

Subscribed and sworn to before me, Michelle Hannon, this 17th day of November, 2008.


Notary Public

COMMONWEALTH OF PENNSYLVANIA
Notarial Seal
Michelle Hannon, Notary Public
City Of Philadelphia, Philadelphia County
My Commission Expires Dec. 22, 2010

Member, Pennsylvania Association of Notaries