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July 27, 2001

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

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Re: Washington Data Distribution Center

Dear Ms. Washburn:

The purpose of this letter is to petition the Commission for an order authorizing the Washington Exchange Carrier Association ("WECA") and the new entrant into the Data Distribution Center ("DDC") to sign addendums that would admit the new entrant into the operation of the DDC without the necessity to circulate the addendum for signature by all other participants in the DDC.

Participation in the DDC is pursuant to Commission approved contracts. The original form of the contract had each of the initial primary toll carriers and WECA sign as signatories to the DDC agreement. Since that time, various other carriers have been admitted through an addendum process. Because of the necessities of contract law, the addendum is sent to each party that has previously joined the DDC. Since we now have before us our ninth and tenth addendums, they are circulating to eleven and twelve prior parties (there were three signatories to the original agreement).

This process has become administratively cumbersome, to say the least. In addition, it has the effect of slowing down a CLEC's participation in the DDC. That can also then have a resulting adverse effect on the CLEC's ability

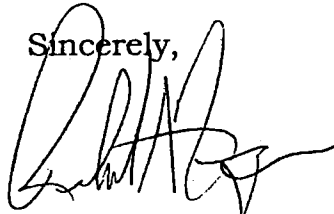
to assess and collect access revenue. Of course, for any CLEC, a delay in revenue stream can be a very important consideration.

In fact, with the last iterations of addendums, it has proven to be impossible to gain the signatures from each of the prior participants. Many of the participants are large corporations, and as people change jobs, the history of what goes on with the DDC and why the addendums are needed gets lost. The DDC addendums have apparently become lost within the confines of some of these corporations, and, as a result, this process has been brought almost to a stop.

In order to allow the DDC to continue to add new members and so that the DDC does not work as a barrier to entry or have an adverse effect on the operations of CLECs, WECA respectfully requests that the Commission issue an order authorizing the DDC process to move forward by adding new participants through the execution of addendums signed by the new participant and WECA.

Your consideration of this request is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'RAF', with a long horizontal flourish extending to the right.

RICHARD A. FINNIGAN

RAF/ej

cc: Craig Phillips
WECA Board
DDC Participants
Tim Zawislak