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Mark S. Reynolds
Senior Director – Regulatory
Public Policy

July 21, 2006

Via E-Mail and U.S. Mail

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn,

On December 2, 2005, Qwest notified CLECs in Washington about a product offering known as Qwest Dark Fiber (QDF). QDF is Qwest's commercial replacement for facilities previously purchased by CLECs as Unbundled Dark Fiber (UDF). This product offering was prompted by the FCC's Order on Remand (CC 01-338) referred to as the "Triennial Review Remand Order" (TRRO) effective March 11, 2005. The TRRO changed the unbundling obligations related to certain UDF services, and also provided CLECs with an eighteen (18) month period from March 5, 2005 (or until September 10, 2006) in which to transition from UDF to alternative service or facility arrangements. Pursuant to the TRRO, Qwest is no longer required to provide UDF Loops in any location.

Under its December 2, 2005 offer, Qwest gave CLECs until February 2, 2006 to enter into commercial arrangements to convert their existing dark fiber facilities and ensure that they would have continued access to, and use of, those dark fiber facilities after September 10, 2006. Many CLECs took advantage of that opportunity and agreed to convert their existing dark fiber base to QDF. With September 10, 2006 approaching, Qwest wanted to make you were aware of the potential disconnection of dark fiber facilities affecting those companies that did not contract for QDF earlier this year. Further, because it is concerned about the potential service disruptions for the end users of CLECs that have failed to make alternative arrangements, and in the spirit of continued cooperation with our wholesale partners, Qwest has announced that, for a limited time, the Qwest Commercial Dark Fiber Services Agreement is again available for execution. Accordingly, Qwest re-notified the remaining two CLECs in Washington of the QDF offer on July 14, 2006. These CLECs will

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have until August 28, 2006 to execute the QDF agreement or make other alternative arrangements to replace the UDF facilities they currently purchase from Qwest.

In order to keep the Commission apprised of this situation, Qwest will provide a status update on August 14, 2006, including notifying the Commission of any CLECs that have failed to make any alternative arrangements for facilities to replace the impacted UDF facilities and, as a result, face disconnection of those facilities.

Should you have questions on this matter, don't hesitate to call me.

Sincerely,

Mark S. Reynolds

MSR/llw