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Ms. Carole Washburn, Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
Box 47250
Olympia, WA 98504-7250

Re: Telecommunications Rules Tune-up; Docket No. UT-040015

Dear Ms. Washburn:

This letter constitutes the initial comments of United Telephone Company of the Northwest dba Sprint on the "Possible Corrections and Changes in Rules in Chapter 480-120 WAC and Chapter 480-80 WAC Relating to Telecommunications" in Docket No. UT-040015.


Sprint wishes to compliment the Commission on their willingness to consider further revisions of these rules based on the experience of stakeholders and Staff in their implementation.

Sprint particularly supports a rule change to WAC 480-120-540, Application of terminating access rule to CLECs. As a matter of competitive neutrality and consistent with previous Commission exemptions, this rule should be changed to permit CLECs to charge a terminating access rate up to the amount that Qwest and Verizon charge, including universal service rate elements.

Sprint will be attending the March 11 workshop and may have further comments at that time.

Should there be any questions or concerns, please feel free to contact Glenn Harris at (541) 387-9290 or by e-mail at glenn.harris@mail.sprint.com.

Sincerely,


Nancy L. Judy