

December 3, 1999

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

Re: Rules Relating to Pick and Choose, Docket No. UT-990391

Dear Ms. Washburn:

Pursuant to the Commission's Notice of Opportunity to Comment (Friday, December 3, 1999) in the above-referenced docket, NEXTLINK Washington, Inc., Electric Lightwave, Inc., and Advanced TelCom Group, Inc. (collectively "Joint Petitioners"), do not have any comments at this time to add to their Petition and the comments they submitted in response to the draft Interpretive and Policy Statement in Docket No. UT-990355. Joint Petitioners recommend that the Commission amend WAC 480-09-530 to incorporate the procedures in the Commission's Interpretive and Policy Statement for expedited resolution of disputes concerning Section 252(i). Joint Petitioners, however, do not believe that Commission rules on substantive issues arising from implementation of Section 252(i) are necessary or advisable and therefore do not propose any rule language to address any such issues at this time.

Joint Petitioners will participate in the workshop scheduled on December 16, 1999, to address these issues further and will provide additional comments, including any appropriate proposed rule language, if the Commission seeks such comments as a result of the workshop or additional proceedings. Please provide me with all notices of any such opportunities to comment or additional proceedings in this docket.

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Please contact me if you have any questions about these comments.

Sincerely yours,

DAVIS WRIGHT TREMAINE LLP

Gregory J. Kopta
Attorney for NEXTLINK Washington, Inc., Electric
Lightwave, Inc., and Advanced TelCom Group, Inc.

cc: Kaylene Anderson
Jackie Follis
Kath Thomas