



WASHINGTON

May 27, 2003

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

Dear Honorable Commissioners:

On behalf of the members of the National Federation of Independent Business I am writing to request that you suspend for further investigation and hearing the petition of Qwest Corporation seeking Competitive Classification of Basic Business Exchange Telecommunications Services.

NFIB is comprised of small, independent business owners, many of which rely on Qwest for business phone services. NFIB has significant concerns that the majority of small business customers of Qwest do not have reasonably available alternatives to Qwest's local exchange service. When surveyed in 1999, 61 percent of NFIB members responded that they would consider changing local phone service, if given a choice.

Market share information that has been provided by Qwest does not prove that effective competition exists. In fact, information shows that a minority of large businesses may purchase a majority of the lines, skewing the market share analysis. With a skewed distribution of lines across customers, Qwest competitors could easily achieve an overall 40 percent market share in an exchange even if it had no small business customers.

For the previously mentioned reasons, NFIB respectfully requests that the Commission suspend the Qwest Petition and set the matter for a hearing where a more complete record may be established for the Commission's consideration.

Sincerely.

Mark Johnson

Assistant State Director

NFIB