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August 26, 2005

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

Re: Docket No. A-050802 - Procedural Rules, WAC 480-07
Qwest's Initial Comments

Dear Ms. Washburn:

Enclosed is a copy of Qwest Corporation's Initial Comments. Qwest provides these Comments in response to the Commission's July 20, 2005 Notice of Opportunity to Comment. An electronic copy of the Comments will be provided by e-mail.

Sincerely,

Lisa A. Anderl