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August 23, 2004

VIA E-MAIL AND HAND DELIVERY

Administrative Law Judge Moss
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-041239 – Notice of Intent to Depose WebTel's
Designee

Dear ALJ Moss:

The purpose of this letter is to provide notice pursuant to WAC 480-07-410(2) of intent to depose WebTel Wireless, Inc.'s designee. Pursuant to WAC 480-07-410(2), this is also a request to schedule a deposition conference.

While no person has been identified by WebTel as a potential witness, under WAC 480-07-410(1), a party may depose a person who has not been identified as a potential witness if the presiding officer approves the deposition on a finding that the person appears to possess information significant to the party's case. In this case, it would be helpful, and may be dispositive, to have a clear understanding of WebTel's operations and the facilities that they use in the course of that operation. It is the nature of WebTel's operation that will determine if it is a telecommunications service or not.

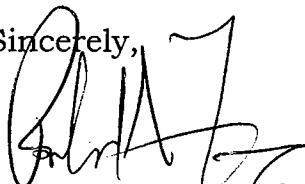
It is my belief that WebTel should be allowed to designate one or more persons who can stand for deposition on behalf of WebTel. This is analogous to the deposition of a corporate designee under CR 30(b)(6).

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COMMISSION

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Your consideration of this request is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read 'RAF', with a large, stylized flourish extending from the end of the signature.

RICHARD A. FINNIGAN

RAF/km

cc: Service List
Clients (via e-mail)