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July 21, 2006

VIA ELECTRONIC MAIL

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504

***Re: Docket No. A-060475
Adoption-by-Reference Rule Revisions in Title 480 WAC***

Dear Ms. Washburn:

Please accept this letter as comments of Verizon Northwest Inc. (“Verizon”) on the Commission’s proposed revisions to the adoption-by-reference rule, WAC 480-120-999. The rule should generally refer to the most recent versions of the indicated standards. The proposed changes to WAC 480-120-999(2)(a) would not do that. The standard provided in that rule (Institute of Electrical and Electronic Engineers (IEEE) Std 820-1984) was revised most recently in 2005. IEEE Std 820-2005 was approved by the IEEE – SA Standards Board on September 22, 2005. Thus, subsection (2)(a) should refer to the “...version in effect on September 22, 2005.”

Sincerely,

/s/

Gregory M. Romano

GMR:kad