

Richard A. Finnigan
Attorney at Law
2405 Evergreen Park Drive SW, Suite B-3
Olympia, Washington 98502
(360) 956-7001
Fax (360) 753-6862

November 10, 1997

Steve McLellan, Secretary
Washington Utilities and Transportation Commission
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-970723 - Proposed Rulemaking to Adopt
Methodology for Determination of Just and Reasonable Rates
for Attachments to Transmission Facilities

Dear Mr. McLellan:

In the Commission's Preproposal Statement of Inquiry, the Commission indicated that it is considering adopting the FCC methodology found at 47 CFR § 1404(g). WITA's primary concern is that care should be taken to determine what effect the FCC's methodology may have on the cost of providing service within the State of Washington. That is important information which should be worked through before the FCC methodology is simply adopted *carte blanche*.

In addition to working through the formula that the FCC has prepared, there are several other issues that should be considered. One is the treatment of multiple pole contacts within the same sheath. Should these be considered one contact or more than one contact?


Another issue is what happens when there is a forced move. Should the owner of the pole have the authority and ability to require the other companies on the pole to pay for the costs of a move at the option of the owner of the pole?

A third issue is what is the Commission's policy on the treatment of competitors on the same pole? Can the owner of a pole, for example, force a competitor off the pole if it desires to make further use of that pole? If it can, how much notice is required? Who is to pay the cost of the move under such circumstances?

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Representatives from WITA will be at the December 3 workshop. As requested in the notice, the original and 11 copies of these comments are being filed with the Commission.

Sincerely,



RICHARD A. FINNIGAN

RAF/aw
cc: Terry Vann

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