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Adam L. Sherr Attorney Policy and Law Department

> Via E-mail and Overnight Delivery

September 6, 2002

Ms. Carole J. Washburn, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7254

> Re: Docket No. UT-980312 Request for Approval of Amendment to the Interconnection Agreement between Qwest Corporation and Covad Communications Company

Dear Ms. Washburn:

In accordance with the Interpretive and Policy Statement issued on June 28, 1996 in Docket No. UT-960269, please find enclosed an original and two (2) copies of the Amendment for CLEC-to-CLEC Cross-Connections to the Interconnection Agreement between Qwest Corporation and Covad Communications Company for the State of Washington.

The enclosed Amendment does not discriminate against non-party carriers. It is consistent with the public interest, convenience, and necessity. It is also consistent with applicable state law requirements, including Commission orders regarding interconnection issues. Qwest respectfully requests that the Commission approve this Amendment expeditiously.

The Order on Arbitration Procedure also requests that a proposed order accompany the filing. Qwest requests a waiver of that requirement, and is not providing one with this filing, as the Commission has, in the past, used its own format for Orders. If this is not satisfactory to the Commission, ple ase contact me and I will forward a proposed order immediately.

Sincerely,

Adam L. Sherr

ALS/llw Enclosures cc: Mary Sullivan (without enclosure) Dhruv Khanna (without enclosure) Megan Doberneck (without enclosure)