Qwest Corporation

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Mark S. Reynolds Assistant Vice President Public Policy & Regulatory Affairs

May 17, 2007

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Re: UT-070199 Notice of Opportunity to Submit Written Comments on the Proposed Rule Amending WAC 480-120-262 (8) - Emergency calls - E911

Dear Ms. Washburn,

Qwest Corporation ("Qwest") provides these comments in response to the Notice of Opportunity to File Written Comments on the proposed rule amending WAC 480-120-262 (8) – Emergency calls – E911. Qwest concurs with the proposed rule which would repeal subsection (8) of WAC 480-120-262. Qwest also agrees with the statement in the CR-102², and believes that new technology has rendered the requirement obsolete.

Sincerely,

Mark S. Reynolds

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¹ UT-070199 Notice of Opportunity to Submit Written Comments on the Proposed Rule Amending WAC 480-120-262 (8) - Emergency calls - E911 by Monday, June 25, 2007, filed by the Commission on May 14, 2007.

² CR-102 filed by the Commission on May 15, 2007; Titled: This rulemaking would consider amending subsection (8) of WAC 480-120-262 Operator service providers (OSPs) relating to Emergency calls (E-911). Because of new technology, the requirement may be obsolete. Docket UT-070199.