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May 18, 2004

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

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RECORDS MANAGEMENT
04 MAY 18 PM 2:45
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: WUTC v. Advanced Telecom Group, Inc., et al.; Docket No. UT-033011

Dear Ms. Washburn:

Pursuant to the Notice of Opportunity to File Responses to Covad's Petition for Review and Clarification of Order No. 05, Integra Telecom of Washington, Inc. ("Integra") files this letter in support of Covad's motion. In compliance with the orders in this case, the original of this letter and twelve copies are included.

Beginning at Page 13 of Integra's Motion for Summary Disposition, Integra addresses the issue of where the obligation to file rests under Section 252. While the Commission did not accept those arguments in Order No. 05, Covad's Petition for Review, which is based on the FCC's Notice of Apparent Liability for Forfeiture ("NAL"),¹ presents an excellent opportunity to revisit the issue.

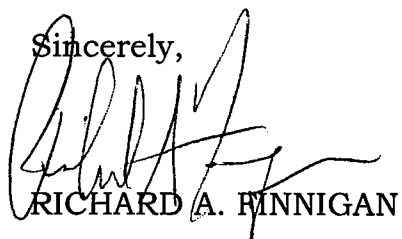
Rather than burdening the record with duplicative arguments, Integra wishes to be on record as supporting Covad's Motion. Further, Integra believes that based on the NAL, the Commission should reconsider Order No. 05 as it relates to all CLECs. Integra urges the Commission to hold that, in light of NAL, the duty to file the agreements rests with Qwest, not the CLECs.

¹ In the Matter of Qwest Corporation Apparent Liability for Forfeiture, Notice of Apparent Liability for Forfeiture, FCC 04-57, File No. EB-03-IH-0263 (rel. March 12, 2004).

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Thank you for your attention to these comments.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

cc: Service List
Deb Harwood
Karen Johnson