

MILLER ISAR INC.
REGULATORY CONSULTANTS

UT-340142 (B)
N/A

STACEY A. KLINZMAN

7901 SKANSIE AVENUE,
SUITE 240
GIG HARBOR, WA 98335
TELEPHONE: 253.851.6700
FACSIMILE: 253.851.6474
HTTP://WWW.MILLERISAR.COM

RECEIVED
RECORDS MANAGEMENT
04 FEB -2 AM 10:41
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Via Overnight Delivery
January 30, 2004

Ms. Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive S.W.
Olympia, Washington 98504

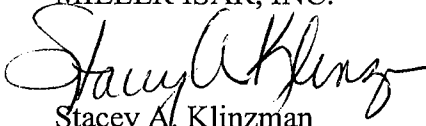
RE: Granite Telecommunications, LLC – Petition for Waiver of WAC 480-120-540

Dear Ms. Washburn:

Enclosed for filing on behalf of Granite Telecommunications, LLC (“Granite”) please find an original and nineteen (19) copies of Granite’s Petition for Waiver of WAC 480-120-540. Granite has electronically filed revised pages of its Price List No. 2, Intrastate Access, establishing terminating access rates that do not exceed the terminating switched rates charged by Qwest or Verizon.

Please acknowledge receipt of this filing by date stamping and returning the additional copy of this filing in the self-addressed, postage paid envelope provided for this purpose. Questions regarding this filing may be directed to me at the telephone and facsimile numbers above, or via electronic mail at sklinzman@millerisar.com.

Sincerely,
MILLER ISAR, INC.


Stacey A. Klinzman
Director – Regulatory Compliance

Enclosures

cc: Geoffrey Cookman, Granite Telecommunications, LLC

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of

Granite Telecommunications, LLC

For Waiver of WAC 480-120-540

Terminating Access Charges

PETITION OF

GRANITE TELECOMMUNICATIONS, LLC

DOCKET NO. UT-040142

Granite Telecommunications, LLC (“Granite” or “Petitioner”) hereby petitions the Washington Utilities and Transportation Commission (“Commission”) for a waiver of Washington Administrative Code (“WAC”) 480-120-540. In support of its Petition, Granite states as follows:

1. Granite is a Competitive Telecommunications Company, approved in Docket No. 031385 on September 27, 2003, and authorized to provide resold interexchange and resold and facilities-based local exchange telecommunications services in Washington.

2. On December 7, 1999, in Docket No. UT – 970325, the Commission adopted WAC 480-120-540. WAC 480-120-540 only permits a local exchange company to include in its terminating switched access rates a charge for recovery of any costs for support of universal access to basic telecommunications service when authorized by the Commission.

3. Granite is not currently authorized by the Commission to include in its terminating switched access rates a charge for recovery of costs for support of universal access to basic telecommunications service.

4. On or about September 7, 1999, the Commission entered its Order Denying Petition for Declaratory Order, Granting Waiver of WAC 480-120-540 in Docket No. UT - 990307. In that Order, the Commission required petitioners to file price lists for terminating access service at rates not to exceed those charged by U.S. West Communications, Inc. and GTE Northwest Incorporated in their respective service territories.

5. On or about August 30, 2000, the Commission entered its Order Granting Waiver of WAC 480-120-540, Terminating Access Charges, in Docket UT-001257. In that Order, the Commission required petitioner to file price lists for terminating access service at rates not to exceed those charged by Qwest Corporation, f/k/a U.S. West Communications, Inc. ("Qwest"), and Verizon Northwest Incorporated, f/k/a GTE Northwest Incorporated ("Verizon"), in their respective service territories.

6. Granite has filed revised pages to its Price List No. 2, Intrastate Access, in which it has establish terminating access rates that do not exceed the terminating switched rates charged by Qwest or Verizon, consistent with the requirements in the Orders in Docket Nos. UT-990307 and UT-001257.

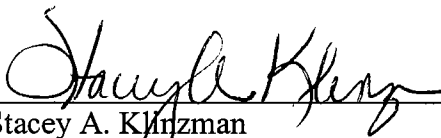
WHEREFORE, Granite requests the following relief:

A. That the Commission grant Granite a waiver of WAC 480-120-540 so that Granite may include in its terminating switched access rates a charge for recovery of costs for support of universal access to basic telecommunications service, as previously granted to petitioners in Dockets UT-990307 and UT-0012576; and

B. Such other or further relief as the Commission finds fair, just, reasonable and sufficient.

Dated this 30th day of January 2004

MILLER ISAR, INC.

By: 
Stacey A. Klinzman
Director – Regulatory Compliance
Regulatory Consultants for Granite
Telecommunications, LLC