

UT-060762

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May 10, 2006

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

Re: Westgate Communications, L.L.C., d/b/a WeavTel – Docket No.
UT-971140 – Request for Waiver and Approval of Revenue
Objective

RECEIVED
RECORDS MANAGEMENT
06 MAY 10 PM 4:25
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Dear Ms. Washburn:

This letter is filed on behalf of Westgate Communications, L.L.C., d/b/a WeavTel (“WeavTel”). The following information is based on representations made by WeavTel or WeavTel’s financial consultants. It is WeavTel’s stated intention to begin operations within the State of Washington on July 1, 2006.

This letter addresses two issues. The first is timing of entry into the Washington Exchange Carrier Association (WECA) pooling process. The second is approval of the Company’s revenue objective.

WAIVER REQUEST

As part of its operations, WeavTel is requesting to be allowed to become involved in the WECA pooling process. In Docket No. UT-971140, the Commission approved the Washington Carrier Access Plan (the “Plan”). See, Ninth Supplemental Order Approving Washington Carrier Access Plan (July 28, 2000).

Part of that Plan deals with pool entry and exit. Under Paragraph 8 of the Plan, a local exchange company (LEC) that desires to enter the WECA pool process must notify the Commission and WECA of the desire to do so on the first day of the calendar quarter. The Plan provides that the LEC’s entry, if otherwise approved, be effective on the first day of the following calendar quarter.

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WeavTel is requesting a waiver of the notice requirement contained in Paragraph 8 so that it may enter the WECA interim USF terminating access pool and originating CCL access pool effective July 1, 2006; provided, that, WECA is able to make the required tariff filings in a timely fashion to do so. As a fall back, WeavTel requests entry into the WECA pooling process effective August 1, 2006. WeavTel would not begin to receive distributions from the WECA pools until it actually begins operations and such distributions would be subject to the normal WECA process for the subject pool.

WECA has indicated that it will attempt to accommodate WeavTel's request to enter the interim USF terminating access pool and originating CCL access pool effective July 1, 2006 and, failing that, effective August 1, 2006. To be sure it is understood, if new WECA rates go into effect July 1, WeavTel would draw from the WECA pools based upon July distributions which are made in August.

On this basis, WeavTel respectfully requests waiver of the notice and filing dates as set forth in Paragraph 8 of the Washington Carrier Access Plan as approved in Docket No. UT-971140.

REVENUE OBJECTIVE

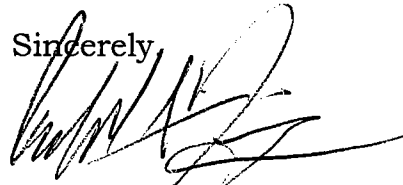
Part of the Plan calls for the LEC to seek Commission approval of a company-specific Revenue Objective. In this case, WeavTel has met with Commission Staff and has arrived at an agreed Revenue Objective. On that basis, WeavTel requests that the Company's Revenue Objective be set at \$737,473 to be used in the WECA rate setting process for the interim USF terminating access pool and a Revenue Objective of \$970 for the originating CCL access pool.

Per WeavTel's discussions with Commission Staff this week, WeavTel is prepared to commit, in the tariff or another forum, to offset that portion of the terminating revenue objective with federal high cost loop funds as they start to flow from USAC currently estimated to begin 4/01/07. WeavTel will provide WECA with the data in sufficient time for WECA to file revised rates in a timely manner.

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Please contact the undersigned with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Finnigan', written over the word 'Sincerely,'.

RICHARD A. FINNIGAN

RAF/km

cc: Rick Weaver (via e-mail)
Carsten Koldsbaek (via e-mail)
Craig Phillips (via e-mail)