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July 17, 2006

VIA ELECTRONIC MAIL AND HAND DELIVERY

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

Re: WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 –
Request for Extension of Time/Waiver

Dear Ms. Washburn:

The Washington Independent Telephone Association (“WITA”) is filing this request on behalf of its member companies. Under WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080, certain certifications and reports are now due on or before July 31, 2006. The purpose of this letter is to request a waiver of the July 31, 2006 filing date contained in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080. Instead of July 31, 2006, a filing date of August 4, 2006, is requested for the CenturyTel and TDS Companies as listed below. A filing date of August 11, 2006, is requested for the other companies listed in this request.

Companies Making the Request

This request for waiver is filed on behalf of the following companies:

1. CenturyTel of Washington, Inc., CenturyTel of Cowiche, Inc., and CenturyTel of Inter Island, Inc. (the “CenturyTel Companies”);
2. Asotin Telephone Company, Lewis River Telephone Company and McDaniel Telephone Company (the “TDS Companies”); and

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STATE OF WASH.
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COMMISSION

3. Ellensburg Telephone Company d/b/a FairPoint Communications, Hat Island Telephone Company, Hood Canal Telephone Co., Inc. d/b/a Hood Canal Communications, Inland Telephone Company, Kalama Telephone Company, Pend Oreille Telephone Company, Pioneer Telephone Company, Mashell Telecom, Inc. d/b/a Rainier Connect, St. John Co-Operative Telephone and Telegraph Company, Tenino Telephone Company, The Toledo Telephone Co., Inc., Western Wahkiakum County Telephone Company d/b/a Wahkiakum West, Whidbey Telecom and YCOM Networks, Inc. d/b/a FairPoint Communications (the "Small Companies").¹

Basis for Request

The Commission engaged in a lengthy, collaborative rulemaking process to establish rules for Eligible Telecommunications Carriers, focusing on the standards for certification and the required reports and certifications for annual "re-certification." The rules were adopted by an order dated June 30, 2006, which was served on the participating parties with a service date of June 30, 2006. The Commission filed its order with the Code Reviser on June 28, 2006, with an effective date of July 29, 2006.

Under the new rules, the reports and certifications described in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 (referred to in this request as the "annual re-certification process") are now due July 31, 2006. Since the date of issuance of the Commission's order adopting the annual re-certification process, the Petitioning Companies have been diligently analyzing the requirements set forth in the rules and making preparations to file the annual reports and certifications described in the rules. However, it does not appear that the Petitioning Companies will be able to meet the July 31, 2006 filing deadline.

Some of the companies have reports due in multiple states. They are using the same staff, by necessity, to prepare those reports. For example, the staff that is working on the TDS Companies' reports will also need to file reports for other TDS companies throughout the nation. TDS will end up filing multiple reports involving 28 states. A similar task is facing CenturyTel and FairPoint Communications.

¹The CenturyTel Companies, TDS Companies and Small Companies are collectively referred to as the Petitioning Companies.

In addition, one of the key elements in the reports that will be submitted for annual re-certification in Washington is the NECA-1 Report. The NECA-1 Report is due July 31, 2006 as well. There is a substantial amount of information that must be developed for the NECA-1 Report. Many of the Petitioning Companies will be unable to alter their schedule to allow them to prepare the NECA-1 Report this year sufficiently in advance of July 31, 2006, to include the NECA-1 Report in the reports and certifications in the annual re-certification process that are also due July 31, 2006. The Petitioning Companies can plan for 2007 so that the 2007 NECA-1 Report is prepared sufficiently in advance to allow the reports and certifications under the annual re-certification process to be filed in a timely manner. However, because of the timing of the adoption of the Washington ETC rules coming so close to the July 31, 2006 deadline, that is not possible for 2006. An extension of time will allow the Petitioning Companies to include the 2006 NECA-1 Reports in this year's filing.

In the case of many of the Small Companies, they lack sufficient staff to prepare all of the reports that are required as part of the annual re-certification process and must rely on outside consultants. The Small Companies have a limited number of outside consultants with whom they have worked with in the past and who have an historical basis upon which they can call to assist in preparation of the reports for the annual re-certification process. Many of these outside consultants are the same ones that are involved in the preparation of the NECA-1 Reports. As a result, the consultant time is not available to allow the Small Companies to meet the July 31, 2006 filing deadline.

The Petitioning Companies are treating the Commission's new rules related to the annual re-certification process very seriously. There is a large amount of critical support money that depends upon the companies receiving the annual re-certification. The amount of information that the new rules appear to require, coupled with the NECA-1 filing date, and the short time between the date the Commission issued its ETC rule adoption order and the due date make it necessary for the Petitioning Companies to file this request.

Requested Relief

It is hereby requested that the July 31, 2006 filing date contained in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 be extended to

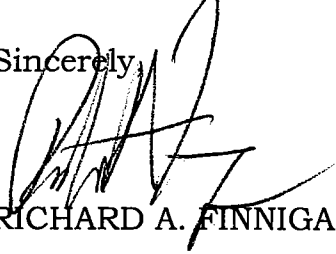
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August 4, 2006 for the TDS Companies and the CenturyTel Companies.

Further, it is hereby respectfully requested that the July 31, 2006 filing date contained in WAC 480-123-060, WAC 480-123-070 and WAC 480-123-080 be extended to August 11, 2006 for the Small Companies.

Your consideration of this request is greatly appreciated.

Sincerely,



RICHARD A. FINNIGAN

RAF/km

cc: Bob Shirley (via hand delivery)
Terrence Stapleton (via e-mail)
Member Companies (via e-mail)