

Washington Exchange Carrier Association

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May 16, 2011

VIA E-MAIL AND HAND DELIVERY

Mr. David Danner, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P. O. Box 47250
Olympia, WA 98504-7250

RE: Advice # 26 – Washington Exchange Carrier Association

Ninth Revision of Sheet No. 1 Canceling Eighth Revision of Sheet No. 1
Ninth Revision of Sheet No. 3 Canceling Eighth Revision of Sheet No. 3
Sixteenth Revision of Sheet No. 9 Canceling Fifteenth Revision of Sheet No. 9
Eighth Revision of Sheet No. 9.1 Canceling Seventh Revision of Sheet No. 9.1
LSN REQUESTED MAY 29, 2011

Dear Mr. Danner:

Washington Exchange Carrier Association (WECA) submits herewith revisions to Washington Exchange Carrier Association Tariff WN U-1 as referenced above. Attached are a redacted and an unredacted copy of the workpapers supporting the tariff filing. The enclosed sheets are filed on a confidential basis because they contain company-specific proprietary data, the disclosure of which could be detrimental to the company and provide competitors with access to competitively sensitive data. The information should not be disclosed without the written consent of the affected companies.

An Excel file of the unredacted version of the workpapers has also been filed via email.

The purpose of this filing is to conform the rates of the Washington Exchange Carrier Association (WECA) consistent with the tariff filing of CenturyTel of Washington, Inc. made on April 29, 2011 pursuant to the Commission's determination in Docket No. UT-100820, Order 14. It is WECA's understanding the filing also covers CenturyTel of InterIsland, Inc. and CenturyTel of Cowiche, Inc. (collectively, with CenturyTel of Washington, Inc., "CenturyTel").

As a result of these changes, the Interim USF rate will decrease from \$.05791 to \$.05205 per terminating rated CCL access minute, and the originating CCL rate will increase from \$.01173 to \$.01662 per originating rated CCL access minute. These proposed rates have been developed on a revenue neutral basis.

In Docket No. UT-971140, Ninth Supplemental Order Approving Washington Carrier Access Plan, the Commission approved methodologies under which the WECA pools will operate. In particular, the Commission's Order effectively directed WECA to allow entrance or exit to the WECA pools on a quarterly basis (January 1, April 1, July 1 or October 1). A local exchange carrier desiring to exit one or more of the WECA pools needs to provide notice prior to the first day of the quarter proceeding the quarter in which the action is to take effect. The Washington Carrier Access Plan (WCAP) also lists specific information that is to be provided to WECA at the time notice is given. In this case, CenturyTel did not provide the notice in a timely fashion and did not provide the required information. Therefore, on behalf of itself and CenturyTel, WECA is requesting that the Commission waive the provisions of Part IV, Paragraph 8 of the WCAP as approved in the Ninth Supplemental Order Approving Washington Carrier Access Plan in Docket No. UT-971140. It is WECA's understanding that CenturyTel concurs in this request.

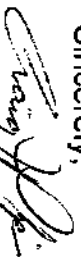
In accordance with the above-mentioned portion of the WCAP, the accompanying tariff sheets have an inserted effective date of October 1, 2011. However, WECA respectfully requests that they be permitted to become effective May 29, 2011, upon less than statutory notice, so that their effective date will coincide with the projected effective date for CenturyTel's filing. Most of the information required by WAC 480-80-122 is contained in the material that is being filed by WECA in connection with this matter. WECA requests, however, waiver of WAC 480-80-122(1)(a)(i) and (ii). These items do not appear to be appropriate for a filing by WECA. The date requested is the proposed effective date for the CenturyTel filings, namely May 29, 2011.

WECA also requests waiver of WAC 480-120-194(1), which requires thirty days notice to individual customers. Notice has been sent to all interexchange carriers currently known to be using access service provided by WECA member companies that incur rates on the sheets that are being revised by this filing. A copy of that notice is attached.

Mr. Robert Smith is authorized to issue the tariff sheets on behalf of the member companies. Mr. Craig Phillips is authorized by WECA to file the revised tariff sheets with the WUTC.

If you have any questions concerning the filing, please contact me at (360) 690-4535.

Sincerely,



Craig Phillips
Administrator

Encs: Tariff revisions

May 16, 2011

IMPORTANT NOTICE

The Washington Exchange Carrier Association (WECA) has filed with the Washington Utilities and Transportation Commission revisions to WECA Tariff No. WN U-1. This filing, which has been made by WECA on behalf of its member companies, modifies access rates applicable to originating and terminating carrier common line (CCL) traffic. The reason for this filing is that the CenturyLink companies (CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., and CenturyTel of Cowiche, Inc.) are withdrawing from the WECA originating CCL pool and the WECA terminating Interim USF pool. CenturyLink is taking this action pursuant to the Commission's order that was issued in its Docket No. UT-100820 relating to the merger of Qwest Communications International, Inc. and CenturyLink, Inc.

The WECA Interim Universal Service Fund terminating rate element will **DECREASE** from \$0.05791 per access minute to \$0.05205 per access minute. The CCL originating rate will **INCREASE** from \$0.01173 per minute to \$0.01662 per minute.

This filing is made on a revenue-neutral basis. It is not expected to produce any additional revenue for WECA member companies beyond that which is produced under the existing rate structure. How it will affect you will depend upon the volume of access minutes that you originate and/or terminate from or to WECA members and whether you originate more access minutes from WECA members than you terminate to WECA members.

Because of the timing of the CenturyLink filing, WECA is requesting that the tariff revisions be permitted to become effective May 29, 2011, upon less than statutory notice (LSN).

If you have questions or concerns regarding the above-mentioned tariff filing, please contact Mr. Craig Phillips at 360-690-4535.

If you would like to obtain information from the commission concerning the filing, or learn more about how the commission regulates companies, you may do so by writing, calling or e-mailing as follows:

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