



500 IDS CENTER
80 SOUTH EIGHTH STREET
MINNEAPOLIS, MN 55402
MAIN: 612.632.3000
FAX: 612.632.4444

GREGORY R. MERZ
ATTORNEY
DIRECT DIAL (612) 632-3257
DIRECT FAX (612) 632-4257
GREGORY.MERZ@GPMLAW.COM

July 11, 2011

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

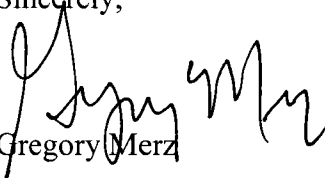
*Via Email records@utc.wa.gov
and Federal Express*

Re: In the Matter of a Complaint by the Joint CLECs Against the Joint Applicants Regarding
OSS For Maintenance and Repair
WA UTC Docket No. (New)

Dear Mr. Danner:

Enclosed as an initial filing please find the original and twelve copies of the Formal Complaint and Petition regarding the above referenced matter. The electronic copy is being provided by email.

Sincerely,



Gregory Merz

Enclosures

cc: Service List
Karen Clauson

GP:3008043 v1

Certificate of Service

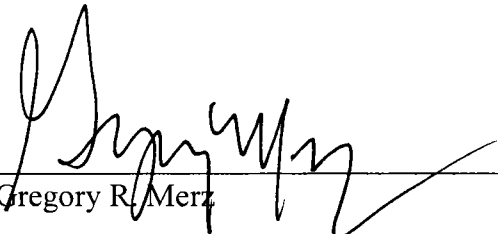
I certify that on July 11, 2011, I caused to be served copies of the attached Formal Complaint and Petition upon the following parties by E-mail and U.S. Mail:

William Weinman
Assistant Director
WUTC
1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-7250
wweinman@utc.wa.gov

Lisa Anderl
CenturyLink/Qwest Law Department
1600 7th Ave., Room 1506
Seattle, WA 981914
Lisa.anderl@qwest.com

Jennifer Cameron-Rulkowski
Assistant Attorney General
Washington State Attorney General's Office,
UTC Division
P.O. Box 40128
Olympia, WA 98504-0128
jcameron@utc.wa.gov

Mark Trincherro
Davis Wright Tremaine
1300 SW Fifth Avenue, Suite 2300
Portland, OR 97201
marktrincherro@dwt.com



Gregory R. Merz