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VIA FACSIMILE (360) 586-1150

ORIGINAL VIA FEDERAL EXPRESS

Mr. Steve McLellan
Secretary, Washington Utilities
and Transportation Commission
1300 So. Evergreen Park Dr. S.W.
Olympia, Washington 98504

Re: Rulemaking on Pole Attachments, Docket No. UT-970723

Dear Mr. McLellan:

NEXTLINK Washington, L.L.C. ("NEXTLINK"), provides the following initial comments in the above-referenced docket. NEXTLINK agrees with the Preproposal Statement of Inquiry that a rulemaking under RCW 80.54 is overdue and will facilitate the emergence of effective competition in Washington. NEXTLINK also agrees that the Commission should adopt the FCC methodology. NEXTLINK, however, will reserve future, more specific comment until the issues and proposals have been more fully developed.

NEXTLINK appreciates the opportunity to comment and looks forward to participating in the rulemaking process. Please provide me with notice of all such opportunities.

Sincerely yours,

DAVIS WRIGHT TREMAINE LLP



Gregory J. Kopta

cc: Deborah Whiting Jaques

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Seattle