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February 12, 2001

Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
Olympia, Washington 98504-7250

Re: Docket Nos. UT-990146
Chapter 480-120 WAC Telecommunications - Operations

Attention: Bob Shirley

Dear Ms. Washburn:

Qwest Corporation (“Qwest”) is submitting these comments pursuant to the Commission’s Opportunity to Submit Written Comments on Proposed Rules, dated January 22, 2001. These comments relate to Chapter 480-120 WAC Telecommunications - Operations proposed rules. Pursuant to the Commission’s request, a copy of these comments is being sent by electronic mail.

Qwest proposes modification to WAC 480-120-049 - Access to premises. The proposed rule should be modified for consistency with RCW 80.36.020. The proposed first sentence should be replaced with the following language:

“A company's obligation to install, maintain, test, or repair its facilities located on or in a customer's premises is conditioned upon the customer granting company personnel the right to access the customer's property during reasonable hours.”

Qwest also concurs with the comments of the Washington Independent Association (“WITA”) concerning WAC 480-120-028 Registration. WITA’s proposed rule modification is appropriate.

If you have questions regarding these comments, I can be reached at 206-345-4726.

Sincerely,

