

April 8, 2002

VIA FACSIMILE, ELECTRONIC MAIL AND OVERNIGHT MAIL

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Post Office Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-023003

Dear Ms. Washburn:

TRACER submits the following response to Judge Berg's instruction in the Second Supplemental Order that parties file written comments identifying the rates that should be reviewed in this docket. Judge Berg has authorized the parties to file these comments by facsimile today and by overnight mail for filing tomorrow.

TRACER concurs in the comments filed by WorldCom and concurred in by AT&T and XO proposing that the Commission review recurring and non recurring rates for loops, switching, and shared transport.

TRACER also agrees with WorldCom, AT&T and XO that the costing methodology used for loops should be consistent across all loop types, including high capacity loops. Accordingly, TRACER submits that the cost models that will be presented by the parties should be capable of developing costs for all loops.

Finally, TRACER also concurs in the comments of WorldCom, AT&T and XO proposing that geographic deaveraging be reviewed in this docket.

Very truly yours,

ATER WYNNE LLP

Arthur A. Butler
Attorneys for TRACER

Cc: Service List

