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December 14, 2011

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

Re:

In the Matter of a Complaint by the Joint CLECs Against the Joint Applicants Regarding

OSS For Maintenance and Repair

Docket No. UT-111254

Dear Mr. Danner:

Enclosed for filing please find the original and seven copies of the Rebuttal Testimony of Lyndall Nipps on Behalf of **tw telecom of washington llc**.

Very truly yours,

Davis Wright Tremaine LLP

Lauren Giles

cc: Service List