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Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: WECA Docket 99-01/WUTC Docket UT-991627

Dear Ms. Washburn:

The purpose of this letter is to transmit to the Commission for its consideration the recommendation from the Technical Subcommittee on Number Resources, as approved by the Board of Directors of the Washington Exchange Carrier Association (WECA), concerning a first round of rate center consolidations.

After many industry meetings to consider proposed rate center consolidations by US WEST Communications, Inc. and GTE Northwest Incorporated, the industry is recommending that the rate center consolidations described below move forward. The rate center consolidations have been presented to the E911 community for their review and the original proposals were modified to take into account concerns for the efficient delivery of E911 services.

The recommended consolidations are set out in Exhibit 1 for US WEST and on Exhibit 2 for GTE Northwest. For US WEST, the proposed consolidation collapses six rate centers into three rate centers. For GTE Northwest, the proposed rate center consolidations collapse twenty-one rate centers into four. Please note that the Whatcom County consolidation for GTE Northwest also includes consolidating those rate centers with the Bellingham rate center served by US WEST.

Based upon the recommendations from the Technical Subcommittee and the WECA Board, and the attached description of the rate center consolidations, WECA respectfully requests that the Commission issue an order approving the recommendations for rate center consolidations and directing US WEST Communications, Inc. and GTE Northwest Incorporated to proceed to implement the rate center consolidations contained in the recommendation. US WEST and GTE

have stated that they can implement the rate center consolidations within six months of the date of receiving an order from the Commission to do so.

Sincerely,

RICHARD A. FINNIGAN

RAF/km

Enclosures as noted

cc: Dave Griffith
Glenn Blackmon
WECA Board Members
Craig Phillips
Docket Participants (via e-mail)