

Law Office of  
Richard A. Finnigan  
2112 Black Lake Blvd. SW  
Olympia, Washington 98512  
Fax (360) 753-6862

Richard A. Finnigan  
(360) 956-7001  
rickfinn@localaccess.com

Kathy McCrary, Paralegal  
(360) 753-7012  
kathym@localaccess.com

---

January 27, 2010

**VIA E-MAIL AND HAND DELIVERY**

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

Re: Docket No. A-091124 - Comments

Dear Mr. Danner:

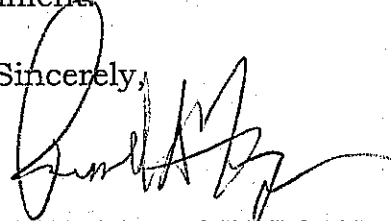
This letter will provide you with the comments of the Washington Independent Telecommunications Association (WITA) in the above-referenced rulemaking. The purpose of this rulemaking is to adopt by reference certain federal rules and other national standards. In earlier comments, WITA pointed out that the adoption of certain rules that were in effect at the FCC on October 1, 1998, appears dated and that it might be better to have the most current version of the FCC rules as the adopted standard.

Commission Staff's response was that the latest versions of 47 C.F.R. Part 32 do not include all of the accounts that were present in the 1998 version. That still does not explain why it is necessary or beneficial to have an adoption of a 1998 rule as the standard. It may be that it is no longer necessary to maintain all of the accounts that were thought to be appropriate in 1998. Staff's response does not address the substance of the question as to whether it makes sense to adopt the more recent version or not.

David Danner  
January 27, 2010  
Page 2 of 2

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in black ink, appearing to read 'Richard A. Finnigan', written over the word 'Sincerely,'.

RICHARD A. FINNIGAN

RAF/km

cc: Client