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May 4, 2006

Ms. Carole J. Washburn
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. A-050802 – Procedural Rules Rulemaking

Dear Ms. Washburn:

For the reasons discussed in its prior comments in this docket, XO Communications Services, Inc. (“XO”) supports the revisions to WAC 480-07-700 that Public Counsel is proposing with its comments filed today in this proceeding.

Please contact me if you have any questions about XO’s position.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta