

**Qwest**

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**Maura E. Peterson**

Paralegal  
Regulatory Law

*Via E-mail and  
Overnight Delivery*

October 20, 2005

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7254

Re: Docket No. UT-\_\_\_\_\_  
Request for Approval of Amendments to the Interconnection Agreement between  
Qwest Corporation and OrbitCom, Inc.

Dear Ms. Washburn:

In accordance with the Commission's ruling in Docket Nos. UT-960310 and UT-043084, Qwest requests approval of the enclosed QPP Master Services Agreement as an amendment to the Interconnection Agreement between Qwest and OrbitCom, Inc. In requesting such approval of the Master Services Agreement, Qwest does not concede that the agreement is subject to approval under Section 252 of the Telecommunications Act of 1996, and this request is without waiver of Qwest's rights to contest any filing requirement and approval or rejection under that section. Depending upon the nature of any future rulings by the FCC or a federal court on the issues relating to commercial agreements, Qwest reserves the right to withdraw its filing of the enclosed and to seek that the disposition of the request for approval be reversed or vacated.

Also enclosed is an original and two (2) copies of the Triennial Review Order and Triennial Review Remand Order Amendment to the Interconnection Agreement between Qwest Corporation and Orbitcom, Inc. and Request for Approval form, completed per the informal request of Commission Staff on May 12, 2004.

The enclosed Agreements do not discriminate against non-party carriers. They are consistent with state and federal law, and are in the public interest.

Qwest respectfully requests that the Commission approve these Amendments expeditiously.

Sincerely,

Maura E. Peterson

cc: Charlie Cobb (without enclosure)  
Brad VanLeur, OrbitCom, Inc. (without enclosure)

CERTIFICATE OF SERVICE

Docket No. UT-\_\_\_\_\_

I hereby certify that I have this day served this cover letter without the enclosed amendments upon all persons listed below who are parties of record in this proceeding, by United States Postal Service first class mail in accordance with WAC 480-07-150.

OrbitCom, Inc. Brad VanLeur, President 1701 N. Louise Ave. Sioux Falls, SD 57107	
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Dated at Seattle, Washington this \_\_\_\_ day of October, 2005.

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Maura E. Peterson