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October 18, 2006

Via Overnight Mail and Email

Carole J. Washburn, Executive Secretary
WASHINGTON UTILITIES & TRANSPORTATION COMMISSION
1300 S. Evergreen park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: SBC Long Distance's Petition for Alternative Measurement and Reporting
Under WAC 480-120-439(12) in Docket No. _____

Dear Ms. Washburn:

Enclosed for filing are an original and 12 copies of SBC Long Distance's Petition
for Alternative Measurement and Reporting Under WAC 480-120-439(12).

If you have any questions regarding this filing, please do not hesitate to contact
me.

Sincerely,

Janice L. Ono
Associate Director – Regulatory

Enclosure