

October 7, 1999

Ms. Carole J. Washburn
Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive, S.W.
Olympia, Washington 98504

RE: Petition for “Fresh Look” Rulemaking

Dear Secretary Washburn:

On behalf of the Competitive Telecommunications Association (“CompTel”), I am writing in support of the petition filed on September 24th by Advanced Telecommunications, Inc., McLeodUSA, Incorporated, and the Western States Competitive Telecommunications Coalition (“Petitioners”) requesting that the Commission initiate a “fresh look” rulemaking.

CompTel is the leading national association representing competitive telecommunications providers. CompTel’s members include national companies as well as many regional carriers providing competitive local, long distance, data, and Internet services in Washington.

As the Petitioners note, several state commissions are considering or have instituted fresh look provisions. In fact, CompTel recently joined with competitors in supporting proposed fresh look rules in Louisiana. As these states recognize, fresh look provisions are critical to ensure that customers are free to choose a CLEC of their choice to provide their telecommunications services.

Allowing customers to switch their local exchange carrier as easily as they today can switch their long distance carrier is consistent with the pro-competitive objectives advanced by this Commission and codified in the 1996 Telecommunications Act. Allowing incumbent local exchange carriers, such as US West to limit a customer’s ability to switch to a CLEC by imposing economic and legal restrictions in the context of customer contracts (contracts which in most cases were entered into before customers had a competitive choice) would serve no purpose other than to shelter US West from the rigors of competition.

**CompTel Letter re:
Petition for “Fresh Look” Rulemaking
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In addition to requiring fresh look provisions, we agree with the comments of the Telecommunications Resellers Association (“TRA”) filed on September 30th that CLECs should be permitted to assume existing incumbent long-term contracts. As TRA correctly notes, allowing for assumption of existing contracts will allow customers to take advantage of competitive alternatives without adversely affecting their current service, while maintaining US West’s existing revenue stream for the term of the contract.

Sincerely,

Terry Monroe
Vice President, State Affairs