

April 8, 2002

VIA FACSIMILE, ELECTRONIC MAIL AND OVERNIGHT MAIL

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Post Office Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-023003

Dear Ms. Washburn:

This responds to the instruction in the Second Supplemental Order that parties file written comments identifying the rates that should be reviewed in this docket. Judge Berg has authorized the parties to file these comments by facsimile today and by overnight mail for filing tomorrow.

As outlined in my October 3, 2001 letter to the Commission in Docket No. UT-003013, Part D, WorldCom proposes that the Commission review recurring and non recurring¹ rates for loops and switching. I am authorized to represent that AT&T and XO join in this request. WorldCom, AT&T and XO also request that the Commission review shared transport rates. These rate elements can be found at sections 9.2, 9.8, 9.10 and 9.11 of Qwest's price list, attached as Exhibit A to its Statement of Generally Available Terms.

WorldCom, AT&T and XO believe that the costing methodology used for loops should be consistent across all loop types. The cost models that will be presented by the parties should be capable of developing costs for all loops. To apply different costing methodologies to different loop sizes makes no sense and would cause confusion among the incumbent local exchange carriers' wholesale customers. Consequently, these parties request that whatever methodology the Commission chooses in this docket be applied across all loop types, including high capacity loops.

WorldCom, AT&T and XO also propose that geographic deaveraging be reviewed in this docket. Deaveraging in the same docket as setting new loop rates will enable competitive local exchange carriers to utilize the updated rates immediately upon the Commission's adoption of the new rates. Waiting to deaverage will only delay utilization of the new

¹The parties understand that some non recurring rates were addressed in UT-003013. The parties will be better able to recommend which non recurring rates should be reviewed in this docket after the order is issued in Part B of that docket.

rates and therefore delay the removal of the barrier to entry posed by the current rates and deaveraging scheme.

Very truly yours,

Michel L. Singer Nelson

Cc: Service List