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November 22, 2017

VIA E-FILING

Mr. Steven V. King, Executive Director and Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Re:

Procedural Rules – Docket A-130355 – Comments of the Washington

Independent Telecommunications Association

Dear Mr. King:

By Notice issued October 16, 2017, the Commission is offering the opportunity to file comments on the second draft of proposed rules for Part III B of WAC 480-07. These are the very brief comments of the Washington Independent Telecommunications Association (WITA).

WITA notes that the points that WITA raised in the first round of comments have been incorporated into Commission Staff's second draft. WITA appreciates the fact that Commission Staff saw fit to adopt WITA's points into the rulemaking proposal. As a result of that action WITA has no further comment.

From WITA's perspective, the rules could go forward for adoption.

RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)