

Rhonda Weaver
Director – Government Affairs



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February 20, 2004

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

RE: UT-040015 – Rulemaking to consider changes to Chapter 480-120 WAC, Chapter 480-80 WAC
and Chapter 480-122 WAC

Dear Ms. Washburn:

Comcast Phone of Washington, LLC (“Comcast Phone”) appreciates the opportunity to submit written comments in the above-captioned docket and plans to participate in the March 11, 2004 stakeholder meeting.

Comcast Phone looks forward to reviewing and commenting on the rules included in the Commission’s rulemaking notice. Two rules included in the CR-101 notice of rulemaking are WAC 480-120-021 and WAC 480-120-302. Comcast Phone believes that the WUTC should also consider including WAC 480-120-439 and any rule related to WAC 480-120-439 for modification to reflect that not all facility-based companies have architectures and infrastructures mirroring the ILEC.

Comcast Phone looks forward to commenting in more detail at the March 11, 2004 workshop and in written comments when we have received proposed alternative language to the rules listed in the CR-101 notice.

Based upon the discussion above, Comcast Phone respectfully requests the Commission to add these rules to the list of rules to be address during the Rulemaking process. Please contact me if you have questions or concerns.

Sincerely,

Rhonda Weaver
Director, Government Affairs