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July 7, 2006

**VIA E-FILING**

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, WA 98504-7250

Re: Docket No. A-050802 – Supplemental Comments

Dear Ms. Washburn:

At the rules adoption hearing held in this matter on June 28, 2006, the Commission authorized the filing of supplemental comments concerning the new language proposed for inclusion in WAC 480-07-700(3). These supplemental comments are filed on behalf of the Washington Independent Telephone Association (“WITA”).

As discussed at the June 28, 2006, hearing, the intent of the proposed new language concerning early initial settlement conference in draft WAC 480-07-700(3)(b) is to provide initial notice to parties that “the game has begun” so to speak. In other words, that if a person or entity feels it has an interest that needs protection, the notice will tell that person or entity that it needs to file a petition to intervene if it wishes to be a player in the game. In addition, the Commission seemed receptive to the concept that once the notice has been given the process should not unduly restrict or delay settlement.

With these two thoughts in mind, WITA respectfully offers the following language for WAC 480-07-700(3)(b):

(b) Early Initial Settlement Conference. Any party that wishes to initiate a settlement conference with any other party between the

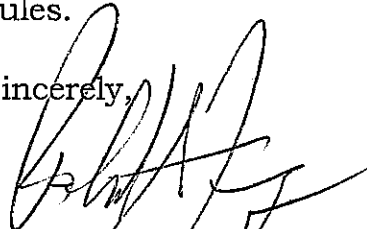
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filing of the initial pleading in the docket and the initial prehearing conference may do so if the party provides ten (10) days prior notice of such conference to the Commission, public counsel and any other entity that has filed a petition to intervene. Where a notice to customers is otherwise required by rule, such early initial settlement conference may be scheduled if the company has included in its notice to customers a statement indicating that an early settlement conference might be scheduled. The notice of early settlement conference will be posted to the Commission's web site. If it is determined that the early initial settlement conference should be continued to another date from the original scheduled date, notice of the new date shall be provided to the parties in the docket and any person or entity that has filed a petition to intervene. Notice of such rescheduled early settlement conference may be on less than ten (10) days.

WITA offers this language as an effort to meet what it perceives as the Commission's intent for this portion of the rules.

WITA thanks the Commission for the opportunity to submit supplemental comments. In addition, WITA wishes to express its appreciation of the Commission's consideration of WITA's earlier comments and the inclusion of some of WITA's suggested changes into the draft rules.

Sincerely,



RICHARD A. FINNIGAN

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cc: Clients (via e-mail)