## Law Office of Richard A. Finnigan

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March 17, 2004

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

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STATE OF WASH.

COMMISSION

Re:

Petition of Asotin Telephone Company for Temporary Suspension of Wireline to Wireless Number Portability Obligations – Docket No. UT-032085

Dear Ms. Washburn:

The purpose of this letter, which is being filed as an original and nineteen copies, is to modify the request for relief contained in the above-referenced Petition. Originally, Asotin Telephone Company ("Company") requested a waiver until June 1, 2005.

The Company has been investigating the availability and reliability of soft-switch technology for a replacement switch. Most switch manufacturers are moving in the soft-switch direction and have put their traditional switches into "maintenance" mode while directing their research and development dollars towards this new technology. The Company's investigation is demonstrating that there are a number of short-term issues that need to be overcome prior to implementation of the new soft-switch technology making a June 1, 2005 turn-up date infeasible. However, the soft-switch technology does hold promise for a lower cost solution to the Company's switching needs than the purchase of another, more traditional switch.

In addition, as set forth in the Petition, to upgrade the existing switch to allow it to provide local number portability (LNP) would cost in excess of

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\$100,000.00. Given the limited life that upgrade would serve and the very few number of customers over which the cost would be spread, that approach does not appear to be reasonable.

Therefore, the Company is requesting that the Commission issue a waiver until June 1, 2006 for the Company to provide LNP. If this request is granted, the Company commits that it will provide interim LNP through the use of remote call forwarding technology from May 24, 2004 until the switch is replaced or June 1, 2006, whichever is earlier.

Thank you for your attention to this amendment.

RICHARD A. FINNIGAN

RAF/km

cc: Gail Long

Linda Lowrance