



December 19, 2006

Via Overnight Express Mail

Ms. Carole J. Washburn
Executive Secretary
WA Utilities & Transportation Commission
1400 S. Evergreen Park Drive S.W.
P.O. Box 40128
Olympia, WA 98504-0128

RECEIVED
RECORDS MANAGEMENT
06 DEC 20 AM 10:57
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: NOTICE OF CHANGE OF CLASSIFICATION PURSUANT TO WAC 480-120-034(4).

Dear Ms. Washburn:

This is to notify the Commission, pursuant to WAC 480-120-034(4), that Eschelon Telecom of Washington, Inc., Advanced Telcom, Inc. and Oregon Telecom, Inc. d/b/a Washington Telecom, Inc. (collectively "Eschelon")¹ has become a Class A local exchange company due to an increase in the number of lines served. Eschelon's line count in Washington has recently passed the threshold for a Class A local exchange company under the Commission's rules.

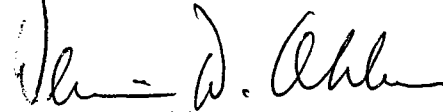
Eschelon anticipated this event and had previously filed a Petition for Alternative Measurement and Reporting which is currently pending in Docket No.

¹ Eschelon Telecom of Washington, Inc., Advanced Telcom, Inc. and Oregon Telecom, Inc. are separate wholly-owned subsidiaries of Eschelon Telecom, Inc., and are affiliates as defined in WAC 480-120-021. WAC 480-120-034(3) provides that for purposes of classifying a company as Class A or Class B, the number of access lines served by the local exchange company includes the number of access lines served in this state by any affiliate of that local exchange company. Therefore, this Notice encompasses all Eschelon companies operating in Washington.

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UT-061443. Please contact Cathy Murray, Manager of Regulatory Affairs at 612-436-1632 if you have any questions.

Sincerely,



Dennis D. Ahlers
Associate General Counsel
Eschelon Telecom, Inc.
730 2nd Avenue South, Suite 900
Minneapolis, MN 55402-2456
(612) 436-6692 (direct)
(612) 436-6816 (department fax)
ddahlers@eschelon.com

cc: Cathy Murray, Manager, Regulatory Affairs, Eschelon Telecom
Deborah Reynolds, WUTC Staff
Richard Busch, Graham and Dunn