

June 8, 2005

VIA ELECTRONIC FILING AND FIRST CLASS MAIL

Carole Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: **Eligible Telecommunications Carrier (ETCs)**
Docket No: UT-053021

Dear Secretary Washburn:

Please accept this supplement to the Comments of Public Counsel previously filed with the Commission in this rulemaking docket. Attached is a Washington State Attorney General's Office Consumer Protection Division white paper issued on May 19, 2004 to the Federal Communications Commission suggesting proposed conditions to the AT&T Wireless Cingular merger. It addresses, in part, our Consumer Protection Division's experience with CTIA's Consumer Code and the shortcomings attendant to it.

We hope that this information will be of value to the Commission's consideration of ETC designations and the reasonableness of reliance on the CTIA consumer code as the FCC has suggested in paragraph 69 of their order, and as described in footnote 169. Public Counsel requests the Commission's careful consideration of the concerns expressed in the white paper.

We look forward to discussing these and other matters further at the upcoming workshop.

Sincerely,

ROBERT W. CROMWELL, JR.
Assistant Attorney General
Public Counsel Section
(206) 464-6595

SJf:cjw
Enclosure

cc: Bob Shirley, WUTC Staff (Campus Mail & E-mail)
Sean Beary, AGO/CP/CRC (Campus Mail & E-mail)