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April 30, 2001

Carole E. Washburn, Executive Secretary

Washington Utilities & Transportation Commission

1300 s. Evergreen Park Drive SW

P.O. Box 47250

Olympia, Washington 98504-7250

Re: Terminating Access Charges Rulemaking, Docket No. UT-990146

Dear Ms. Washburn:

McLeodUSA Telecommunications Services does hereby file its written comments pursuant to Notice of Opportunity to File Written Comments and to Propose alternative rule Language issued April 6, 2001 in the above referenced docket. McLeodUSA supports the adoption of the new (7) provision which is consistent with waivers previously accorded to CLECs. However, McLeodUSA strongly opposes the adoption Staff's alternative set forth in proposed WAC 480-120-AAA.

Proposed (7) appears to be competitively neutral and allows for nondiscriminatory recovery all relevant charges. It appropriately captures the waivers previously granted by the Commission to competing local exchange carriers and does not, accordingly, impose additional burdens on competing local exchange carriers.

McLeodUSA appreciates the opportunity to comment on the proposed rule change and urges that the Commission adopt the new section (7) to WAC 480-120-540.

Respectfully yours,

Marianne K. Holifield

