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Theresa Jensen
Director - Policy and Law

April 30, 2001

Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
Olympia, Washington 98504-7250

Re: Docket No. UT-990146 - Terminating Access Charges
Attention: Bob Shirley and Tim Zawislak

Dear Ms. Washburn:

Following are Qwest's comments in the above referenced docket. These comments were also filed electronically. Qwest appreciates the opportunity to provide additional comment on the proposed rule modifications in WAC 480-120-540, WAC 480-120-AAA, and WAC 480-120-X11. In addition, Qwest will attend the May 8, 2001 workshop.

WAC 480-120-540 Terminating Access Charges:

Qwest does not support collection of subsection (3) rate elements by competitively classified local exchange companies when such companies do not provide residential service, or business service on a universal basis, at rates below cost.

WAC 480-120-AAA Universal Service Cost Recovery Authorization:

Qwest prefers this proposed language over WAC 480-120-540(7). It appears the proposed language resolves the concern expressed above. Qwest appreciates the number of revisions made by the Commission staff in the latest proposed rule that clarify the rule and that resolve a number of issues addressed by Qwest in its February 14, 2001 comments. We also thank the Commission staff for recognizing the importance of parity in regulation when carriers are captive to other carrier's terminating access service charges.

WAC 480-120-X11 Access charge and universal service reporting

Qwest offers the following comments on the latest proposed rules.

(1)(c) The proposed rule language seems to suggest the company will be permitted to provide new or updated cost support based on current access lines in service. However, if the company does not choose to do so, the company will be allowed to retain the revenue amount used in the prior year calculation. If such is the case, this proposed language is reasonable. Qwest looks forward to further discussion of this proposal at the May 8, 2001 workshop.

(2)(a) Qwest is reviewing this language further and will provide further comment at the workshop.

If you have questions regarding these comments, I can be reached at 206-345-4726

Sincerely,

Theresa Jensen