

November 16, 2007

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
P O Box 47250
Olympia, Washington 98504-7250

Dear Secretary Washburn:

Re: *Rulemaking Concerning Telecommunications Service (Line) Extensions*
Docket UT-073014

The Washington Utilities and Transportation Commission ("Commission") provided notice to telecommunications companies of the opportunity to file written comments and to participate in workshops *"to examine whether new or revised regulations are needed to govern telecommunications service extensions."* The Commission later canceled the second rulemaking workshop citing the development of a significant record in this matter.

A coalition of telecommunications companies that filed comments in this rulemaking proceeding and participated in the rulemaking workshop determined that a consensus industry position on line extension regulations could be of significant assistance to both the Commission and the industry. To that end, the coalition has worked collaboratively to develop amendatory language to the current line extension rules. The coalition, including Verizon and Qwest, and CenturyTel, Embarq, TDS Telecom, Kalama-Tenino Telephone and other Member Companies of the Washington Independent Telephone Association, submit its proposed amendatory language to the current rule, WAC 480-120-071.

In this draft rule language, the coalition sought to address the questions proffered in the Commission's August 14, 2007 Notice, and offers revisions to current rules to address the administrative complexity ingrained in those rules.

We respectfully submit for consideration by the Commissioners and Staff the enclosed coalition amendments to the current rule. The coalition looks forward to continuing its active participation in the Commission's review of the line extension rule.

Sincerely,

Terrence Stapleton