

September 10, 1999

Washington Utilities and Transportation Commission  
1300 Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, WA 98504-7250

**Re: Supplemental Comments of Covad Communications Company re:  
Telecommunications Collocation Rulemaking Docket No. UT-990582**

Dear Commission,

Covad Communications Company (“Covad”) submits these supplemental comments to bring to the Commission’s attention certain facts that arose after Covad filed its opening comments in this docket.

On August 10, 1999, U S WEST agreed to permit Covad to collocate ATM equipment in U S WEST central offices, as required by the FCC’s Collocation Order. As a result, U S WEST withdrew a complaint it filed against Covad with the Colorado Public Utilities Commission on August 6, 1999. In that complaint, U S WEST had asked the Colorado PUC to declare that U S WEST was not required to collocate ATM equipment.

Despite U S WEST’s current agreement on this point – and despite the FCC’s clear language governing this point – Covad remains concerned that U S WEST might change its mind again and either refuse future ATM collocation requests or try to force Covad to remove its ATM equipment from existing collocation arrangements.

Accordingly, Covad again strongly urges the Commission to adopt the following explicit collocation rule to resolve this issue in Washington once and for all:

“An incumbent must permit CLECs to collocate any equipment used in the provisioning of advanced telecommunications services.”

In addition, Covad continues to support adoption by the Commission of the draft rules proposed by ACI Corp. (now, Rhythms Links) in its Petition for Rulemaking in Docket No. UT-990469, as well as the rule regarding remote terminal collocation proposed by Covad in its opening comments in this docket.

Respectfully Submitted,  
COVAD COMMUNICATIONS COMPANY

By: W. Clay Deanhardt  
Senior Counsel  
Covad Communications Co.

cc: Mr. Brooks E. Harlow