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March 25, 2004

VIA ELECTRONIC MAIL AND UPS OVERNIGHT

Ms. Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive, SW
Olympia, Washington 98504

Re: Docket No. UT-043013 - Competitive Carrier Coalition Comments on Issues

Dear Ms. Washburn:

In response to the Washington Utilities and Transportation Commission's ("Commission's") March 22, 2004, Notice of Opportunity to Submit Issues List and Comments, Advanced Telecom Group Inc.; BullsEye Telecom Inc.; Comcast Phone of Washington LLC; DIECA Communications, Inc. d/b/a Covad Communications Company; Global Crossing Local Services Inc.; KMC Telecom V, Inc., and Winstar Communications LLC (collectively, the "Competitive Carrier Coalition") hereby submits these comments. The Competitive Carrier Coalition's Answer (dated March 19, 2004) to the Petition for Arbitration filed by Verizon Northwest Inc. contains both substantive comments regarding Verizon's Petition as well as procedural suggestions for the conduct of this proceeding. As stated in the Answer, the Competitive Carrier Coalition submits that the Commission must incorporate in this arbitration proceeding issues related to the FCC's Triennial Review Order ("TRO"), the D.C. Circuit's *USTA II* decision, state law and other federal law requirements, in order to ensure that all of Verizon's obligations are appropriately reflected in the resulting interconnection agreements, minimize duplication of effort and promote the most efficient use of the Commission's resources.

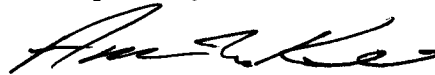
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With regard to the question of whether issues raised by Verizon's Petition should be addressed in this proceeding or in the Verizon model interconnection agreement proceeding (Docket No. UT-011219), the Competitive Carrier Coalition submits that the issues are most appropriately addressed in this docket, UT-043013. Given the number of parties affected by the Verizon Petition and, more generally, by the TRO and other state and federal law issues, it is most logical for this new docket to serve as the primary forum for resolution of the issues. As the Commission is faced with ensuring that each carrier's interconnection agreement reflects all of Verizon's legal obligations, new and unique issues will arise that can be better addressed in this docket, separate from the Verizon model interconnection agreement docket. Accordingly, the Commission should use this docket to address procedural and substantive issues raised by the Competitive Carrier Coalition in its Answer as well as those raised by other CLEC commenters. As noted in the Answer, the Commission should begin by ordering Verizon to (1) adhere to the FCC's newly clarified commingling and routine network modification requirements without delay, and (2) refrain from any unilateral action that prevents access to unbundled elements until such time as the interconnection agreements are duly amended to reflect any final changes in law.

An original and twelve (12) copies are being served on the Commission in addition to the electronic filing. Please date-stamp the duplicate copy enclosed herein and return it in the envelope provided. Should you have any questions concerning this matter, please contact the undersigned counsel at (202) 955-9600.

Respectfully submitted,



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Advanced Telecom Group Inc.
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DIECA Communications, Inc. d/b/a Covad
Communications Company
Global Crossing Local Services Inc.
KMC Telecom V, Inc., and
Winstar Communications LLC

Enclosures

cc: Hon. Ann E. Rendahl, Administrative Law Judge
Service List (via electronic mail)