

Law Office of
Richard A. Finnigan
2112 Black Lake Blvd. SW
Olympia, Washington 98512

Richard A. Finnigan
(360) 956-7001
rickfinn@localaccess.com

Candace Shofstall
Legal Assistant
(360) 753-7012
candaces@localaccess.com

July 31, 2018

VIA E-FILING

Mr. Mark L. Johnson, Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket A-130355 – Rulemaking to Make Corrections and Changes to Rules in
WAC 480-07, Relating to Procedural Rules – Comments of the Washington
Independent Telecommunications Association

Dear Mr. Johnson:

By Notice of Opportunity to File Written Comments on Proposed Rules dated July 2, 2018, the Commission called for comments on the proposed rules related to Parts III B through IV in Chapter 480-07 WAC. The Washington Independent Telecommunications Association (WITA) appreciates the opportunity to comment. WITA has reviewed the rules and has no substantive comments to offer at this time.

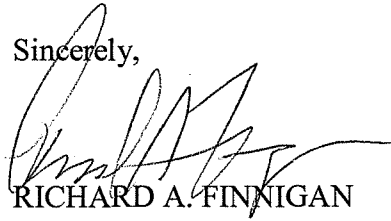
Even though WITA has no substantive comments to offer at this time, WITA appreciates the fact that the Commission took into account the prior comments from WITA and moved Class B telecommunications companies from WAC 480-07-510 to WAC 480-07-530 for general rate case filing requirements. On behalf of its members, WITA expresses its appreciation of the Commission's recognition of the financial limitations faced by small telecommunications companies. Although general rate cases filed by small telecommunications companies are few and far between, the reclassification better reflects the operations and financial capabilities of small telecommunications companies.

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Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/cs

cc: Client (via e-mail)