

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter Of)	Docket No. _____
TSS DIGITAL SERVICES, INC.)	DECLARATION OF JUDITH A. ENDEJAN
Petition for Enforcement Of Its Interconnection)	REGARDING NOTICE REQUIRED BY
Agreement With Qwest Corporation (f/k/a)	WAC 480-07-650(1)(c)
US WEST COMMUNICATIONS, INC.))	
Pursuant to WAC 480-07-650)	
_____)	

I, Judith A. Endejan, hereby declare and state as follows:

1. I am counsel for TSS Digital Services, Inc. ("TSS"), the Petitioner in this Docket. My business address is Graham & Dunn, P.C., Pier 70, 2801 Alaskan Way, Suite 300, Seattle Washington, 98121-1128. I make this Declaration based upon my personal knowledge.

2. Attached hereto as Exhibit A is a true copy of the June 11, 2007 Notice provided to Qwest Corporation ("Qwest") of TSS's intent to file the petition for enforcement of its interconnections agreement with Qwest, which is being filed herewith.

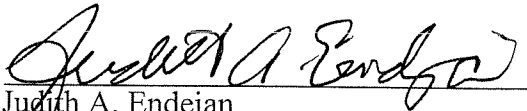
3. Counsel for Qwest, Lisa Anderl, contacted me and asked if TSS would delay filing the petition for enforcement until she had the chance to respond. I agreed that we would wait until after her return from a three week trip on July 9, 2007, and then we would review Qwest's response before filing the petition. In exchange, Ms.Anderl agreed to waive the 30-day notice restriction in WAC 480-07-660 (1)(c). Attached hereto as Exhibit B is a copy of an e-mail exchange that reflects this agreement.

4. We have reviewed a response from Qwest, but the dispute between the parties has not been resolved.

DECLARATION OF JUDITH A. ENDEJAN REGARDING NOTICE REQUIRED BY
WAC 480-07-650(1)(C)
Docket No. _____

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE
STATE OF WASHINGTON THAT THE FOREGOING IS TRUE AND CORRECT.

SIGNED at Seattle, Washington this 30th day of July, 2007.



Judith A. Endejan

EXHIBIT A

June 11, 2007

JUDITH A. ENDEJAN
206.340.9694
jendejan@grahamdunn.com

Via Hand Delivery

Lisa Anderl
Sr. Attorney, Policy & Law
Qwest Communications, Inc.
1600 Seventh Ave, Ste. 3206
Seattle, WA 98191

Re: TSS Digital Petition for Enforcement of Interconnection Agreement

Dear Lisa:

On behalf of our client TSS Digital Service, Inc., we are enclosing:

- (1) Petition for Enforcement of Interconnection Agreement;
- (2) Declaration of Tom Ellis in Support of said Petition;
- (3) TRO/TRRO Amendment to the Qwest/TSS Interconnection Agreement.

These documents will be filed with the Washington Utilities and Transportation Commission (WUTC) on June 21, 2007. This letter constitutes the notice required by WAC 480-07-650(1)(c). TSS remains interested in seeking a prompt resolution of the disputes described in the Petition and would welcome the opportunity to meet prior to June 21, 2007 to try to work them through with you.

We look forward to hearing from you. Thank you.

Very truly yours,

GRAHAM & DUNN PC


Judith A. Endejan

JAE/ceh

Pier 70
2801 Alaskan Way ~ Suite 300
Seattle WA 98121-1128
Tel 206.624.8300
Fax 206.340.9599
www.grahamdunn.com
SEATTLE ~ PORTLAND

Lisa Anderl
June 11, 2007
Page 2

Encl.
cc: Thomas D. Ellis

m27361-891344.doc

EXHIBIT B

Endejan, Judith A.

From: Endejan, Judith A.
Sent: Tuesday, June 12, 2007 2:43 PM
To: 'Anderl, Lisa'
Cc: tomellis@tss.net
Subject: RE: TSS Digital Complaint

Dear Lisa, This will confirm your e-mail and our conversation. TSS will not file the petition for enforcement until July 9th after your return from Europe. In exchange Qwest will suspend collection efforts and will not assess any late charges or penalties from today's date. You also agreed to waive the 30-day notice restriction in WAC 480-07-660(1)(c). We look forward to working with you upon your return. Have a wonderful and safe trip! Regards, Judy

From: Anderl, Lisa [mailto:Lisa.Anderl@qwest.com]
Sent: Tuesday, June 12, 2007 1:53 PM
To: Endejan, Judith A.
Subject: TSS Digital Complaint

Hi Judy – This is to let you know that Qwest is willing to hold in abeyance any collection action in connection with the notice of filing of a petition for enforcement of the ICA that you sent over yesterday, in exchange for TSS's agreement not to actually file the petition until July 9 or later. This will enable me to handle the matter once I get back from vacation. Thank you and Tom for your courtesy on this. While I'm gone, we will be gathering data on the issues raised in the petition and we would be happy to meet with you on my return to see if we can resolve this short of litigation.

Can you confirm by return e-mail? Thanks!

Lisa A. Anderl
Associate General Counsel
Qwest Regulatory Law
206-345-1574
lisa.anderl@qwest.com

This communication is the property of Qwest and may contain confidential or privileged information. Unauthorized use of this communication is strictly prohibited and may be unlawful. If you have received this communication in error, please immediately notify the sender by reply e-mail and destroy all copies of the communication and any attachments.

7/27/2007