## Law Office of Richard A. Finnigan

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May 23, 2013

## VIA E-FILING

Mr. Steven V. King, Acting Executive Director and Secretary Washington Utilities and Transportation Commission 1300 South Evergreen Park Drive SW Olympia, WA 98504-7250

Re:

St. John Co-operative Telephone and Telegraph Company - Sixth Revised Sheet No. 63 Canceling Fifth Revised Sheet No. 63; First Revised Sheet No. 63.1.32 Canceling Original Sheet No. 63.1.32

Dear Mr. King:

Attached you will find the above-referenced Tariff Sheets. The purpose of this filing is to clarify that the company-specific terminating access rates for Switched Access Service no longer apply. Instead, the WECA Tariff WN U-2 adoption by reference of the NECA Tariff F.C.C. No. 4 and NECA Tariff F.C.C. No. 5 means that the applicable provisions of those tariffs will control.

The result of these changes is that the company is adopting the rate structure and rates for terminating Switched Access Service that exist on the interstate level for intrastate purposes. In addition, the company is adopting the Direct Trunked Transport rate structure and rates for both originating and terminating service that exist on the interstate level for intrastate purposes.

This filing is intended to meet the Federal Communications Commission's requirements in its Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011)(USF/ICC Transformation Order) and as contained in 47 C.F.R. § 51.909.

Mr. Morasch has authority to sign tariff sheets for St. John Co-operative Telephone and Telegraph Company. The undersigned has authority to file said sheets on behalf of St. John Co-operative Telephone and Telegraph Company.

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Thank you for your attention to this matter.

RICHARD A. FINNIGAN

RAF/cs Enclosures

cc: Greg Morasch (via e-mail)

Doug Neff (via e-mail)

Jenifer Wasnock (via e-mail)