

September 8, 1999

Carole J. Washburn, Secretary  
Washington Utilities and Transportation Commission  
P. O. Box 47250  
Olympia, WA 98504-7250

Subject: Collocation Rulemaking  
Docket No. UT-990582

Dear Carole:

Pursuant to the Commission's Notice of Opportunity to File Supplemental Comments, the Washington Independent Telephone Association (WITA) files these brief comments.

WITA agrees that if intrastate rules for collocation are needed, those rules should be based upon and should closely track the rules adopted by the Federal Communications Commission (FCC) in CC Docket No. 98-147, First Report and Order and Further Notice of Proposed Rulemaking, In the Matter of Deployment of Wireline Services Offering Advanced Telecommunications Capability (March 31, 1999). Any changes from the FCC's rules should be kept to an absolute minimum. Incumbent carriers that operate in many states, such as GTE Northwest Incorporated, need consistency from state to state. Inconsistent standards simply make it more difficult for a company like GTE Northwest to then meet the needs of the various competitive local exchange carriers in each state. Inconsistent standards will slow down, not enhance, the collocation process.

WITA believes that the rules should contain a statement identifying when the rules apply. While it should be intuitive that these rules apply only where an incumbent local exchange carrier has an interconnection agreement arrived at through negotiation or arbitration under Sections 251 and 252 of the Telecommunications Act of 1996, that intuitive conclusion should be stated.<sup>1</sup>

To: Carole J. Washburn, Secretary

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<sup>1</sup> Identification of the carriers to whom the rule applies is more important in Docket UT-990261, carrier-to-carrier service quality rulemaking. In that docket, the application of the rules may not be as readily apparent.

The language for this proposed portion of the rules could read as follows:

WAC 480-120-XXX **Application of collocation rules.** The collocation rules set forth in WAC 480-120-XXX to WAC 480-120-YYY shall apply to those carriers that have entered into interconnection agreements, whether by negotiation or arbitration or combination thereof, under Sections 251 and 252 of the Telecommunications Act of 1996.

WITA's last comment is that it may be helpful to call for a second supplemental round of comments to address the various rulemaking proposals filed by the interested parties in this docket. Comments on the various proposals may be beneficial to Commission Staff in pulling together a set of proposed rules.

Pursuant to the direction contained in the Notice of Opportunity to File Supplemental Comments, we are filing the original and nineteen-(19) copies of our comments and are providing a disk in WordPerfect. In addition, as requested, copies have been sent to the persons participating in this docket as identified on the Commission's service list.

Sincerely,

TERRY VANN  
Executive Vice President

RAF/rlj  
Enclosures

cc: Rebecca Beaton

Interested Parties

WITA Board Members