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January 6, 2006

VIA E-MAIL, E-FILING AND HAND DELIVERY

Theodora Mace, Administrative Law Judge
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Docket No. UT-050606; WUTC v. Inland Telephone Company – Staff's
Motion for Summary Determination

Dear Ms. Mace:

I have had a brief opportunity to review the Answer Supporting Commission Staff's Motion for Summary Determination submitted by Public Counsel. The purpose of this letter is to request an opportunity to have the time to do a more in-depth review and, if necessary, submit a supplemental response. I have discussed this request with Mr. Swanson for Commission Staff and Ms. Krebs for Public Counsel and they have both authorized me to represent to you that they do not object to that opportunity.

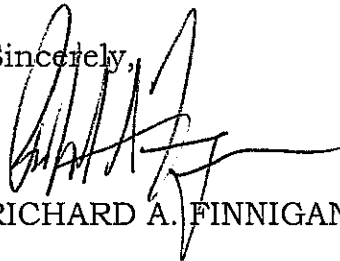
The basis for this request is that Public Counsel includes citations to authorities other than used by Commission Staff. In addition, it appears that there is a slightly different argument being presented by Public Counsel than was submitted by Commission Staff, at least on some of the points.

While I have not discussed this request with counsel for Suncadia, LLC or Intelligent Community Services, it is my understanding that they are not submitting briefing on this motion and, thus, would not be greatly affected by this request.

Theodora Mace
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Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'RAF', with a long horizontal flourish extending to the right.

RICHARD A. FINNIGAN

RAF/km

cc: Service List (via e-mail)
James Brooks (via e-mail)
Greg Maras (via e-mail)
John Coonan (via e-mail)