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January 9, 2006

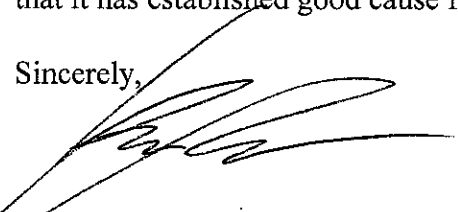
Theodora Mace, ALJ
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
P. O. Box 47250
Olympia, Washington 98504-7250

Re: *WUTC v. Inland Telephone Company*
Docket No. UT-050606

Dear Judge Mace:

Staff believes that Inland's response to Staff's Motion for Summary Determination raises issues/facts that necessitate a reply from Staff. Specifically, from Staff's perspective Inland improperly raises issues/facts not raised in its initial round of testimony. Staff wishes to object to these issues/facts. Additionally, Inland's response raises procedural issues regarding what may be considered under motions for summary determination and the proper standard of proof, which may have implications for other proceedings. Therefore, Staff requests the opportunity to file a reply to Inland's response on January 17, 2006. This date would be convenient for all parties since Inland will be filing its response to Public Counsel's response on this date. Staff believes that it has established good cause for requesting the opportunity to file a reply.

Sincerely,



CHRISTOPHER SWANSON
Assistant Attorney General

CS:tmw
Enclosure
cc: Parties

