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January 9, 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

Dear Judge Mace:

This letter will respond to the Commission Staff letter of January 9, 2006. There are two aspects to Staff's letter.

First, Staff states that it wishes to file certain objections. Once those objections are made, Inland would expect to have the opportunity to respond to any such objections.

Second, Staff states a desire to reply to at least two issues. As to Staff's desire to file a reply to the proper standard of proof, Inland has no objection.

It also appears that Staff would like to file comments on the procedural issue regarding what may be considered for motions for summary determination. This issue is one that Inland would object to without having more detail. It sounds like it may encompass a detailed supplement to every issue addressed in Staff's original motion. Inland would object to Staff having the opportunity to reargue its original motion.

The undersigned has not had an opportunity to clarify this further with Commission Staff counsel because of the need to travel to Oregon for a

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proceeding. The undersigned will be back in the office on January 11, 2006.

Sincerely,

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)