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By E-Mail and Federal Express

Ms. Carole J. Washburn
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

Re: Docket No. UT-041629; CR 101 Considering Amendment of WAC 480-120-450

Dear Ms. Washburn:

Time Warner Telecom of Washington, LLC ("TWTC") provides the following comments in response to the January 14, 2005 Notice of Opportunity to Comment ("Notice") in the above-referenced docket. TWTC shares the concerns and agrees with the comments expressed by MCI in its response to the Notice. TWTC, therefore, supports and joins in MCI's response.

Please contact me if you have any questions about TWTC's position.

Very truly yours,

Davis Wright Tremaine LLP

Gregory J. Kopta

cc: Brian Thomas