

Law Office of  
Richard A. Finnigan  
2112 Black Lake Blvd. SW  
Olympia, Washington 98512  
Fax (360) 587-3852

Richard A. Finnigan  
(360) 956-7001  
rickfinn@localaccess.com

Kathy McCrary, Paralegal  
(360) 753-7012  
kathym@localaccess.com

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January 13, 2012

**VIA E-MAIL AND HAND DELIVERY**

David Danner, Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

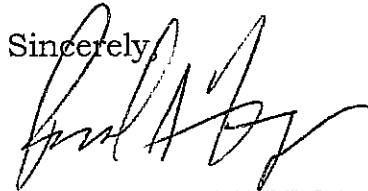
Re: Docket UT-111816 - Washington Independent Telecommunications  
Association, et al. v. McLeodUSA Telecommunications Services,  
L.L.C. and PAETEC Communications, Inc.

Dear Mr. Danner:

Enclosed are the original and three copies of a Motion to Compel  
Responses to Discovery and Certificate of Service.

Thank you for your attention to this matter.

Sincerely,



RICHARD A. FINNIGAN

RAF/km  
Enclosures

cc: Service List  
Clients (via e-mail)