

David L. Rice
david.rice@millernash.com
(206) 777-7424 direct line

March 8, 2007

VIA ELECTRONIC MAIL & U.S. MAIL

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
Post Office Box 47250
1300 S. Evergreen Park Dr. SW
Olympia, Washington 98504-7250

Subject: Qwest AFOR, Docket No. UT-061625

Dear Ms. Washburn:

The Northwest Public Communications Council ("NPCC") is an intervenor in the above-referenced docket and also a party to the Settlement Agreement filed on March 6, 2007 in this proceeding ("Settlement Agreement"). NPCC has not joined in the settlement narrative filed by Qwest Corporation ("Qwest") in support of the Settlement Agreement because NPCC does not take a position on the alternative form of regulation ("AFOR") proposed by Qwest except to the extent that it relates to the issues that NPCC raised in this proceeding pertaining to payphone services. NPCC provides this separate narrative statement pursuant to WAC 480-07-740 supporting only the aspect of the Settlement Agreement that is relevant to that issue.

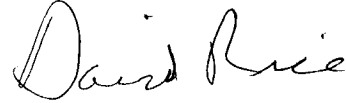
NPCC intervened because the originally-proposed AFOR impacted payphone services. The Settlement Agreement resolves this issue by amending the AFOR so that it will not impact payphone services. This provision of the Settlement Agreement is in the public interest, because it complies with federal law regarding the FCC's New Services Test as it relates to payphone services. *See In the Matter of Wisconsin Public Service Commission, Order Directing Filings*, 17 FCC Rcd. 2051 at ¶ 23 (2002); *see Order on Reconsideration*, 11 FCC Rcd. 21,233 at ¶ 163; *see also* 47 C.F.R. § 61.49(h). Resolving this issue short of full litigation conserves party and Commission resources.

NPCC does not take a position on the other provisions of the Settlement Agreement and does not oppose Qwest's AFOR proposal as modified by the Settlement

Carole J. Washburn
March 8, 2007
Page 2

Agreement. Based on the amendment described above, the NPCC recommends that the Commission approve the Settlement Agreement. Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads "David Rice". The signature is written in a cursive style with a large initial "D" and a long, sweeping underline.

David L. Rice

cc: All Parties of Record

CERTIFICATE OF SERVICE
WUTC Docket No. UT-061625

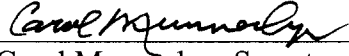
I hereby certify that a true and correct copy of the foregoing was served on the parties of record via electronic mail and first-class U.S. Mail in postage pre-paid envelopes properly addressed as follow:

Arthur A. Butler Ater Wynne LLP 601 Union Street, Suite 5450 Seattle, WA 98101-2327 aab@aterwynne.com	Lisa A. Anderl Qwest Corporation 1600 7 th Ave., Room 3206 Seattle, WA 98191 lisa.anderl@qwest.com
Mark S. Reynolds Qwest Corporation 1600 7 th Ave., Room 3206 Seattle, WA 98191 mark.reynolds3@qwest.com	Adam L. Sherr Qwest Corporation 1600 7 th Ave., Room 3206 Seattle, WA 98191 adam.sherr@qwest.com
Simon J. ffitch Attorney General of Washington Public Counsel Section 800 Fifth Ave., Suite 2000 Seattle, WA 98104-3188 simonf@atg.wa.gov	Stefanie Johnson Attorney General of Washington Public Counsel Section 800 Fifth Ave., Suite 2000 Seattle, WA 98104-3188 stefaniej@atg.wa.gov
Mary Kimball Attorney General of Washington Public Counsel Section 800 Fifth Ave., Suite 2000 Seattle, WA 98104-3188 maryk2@atg.wa.gov	Gregory J. Kopta Davis Wright Tremaine LLP 1501 4 th Ave., Suite 2600 Seattle, WA 98101-1688 gregkopta@dwt.com
Stephen S. Melnikoff U.S. Army Litigation Center Regulatory Law Office 901 N. Stuart Street, Suite 700 Arlington, VA 22203-1837 stephen.melnikoff@us.army.mil	Gregory J. Trautman Attorney General of Washington Utilities & Transportation Division 1400 S. Evergreen Park Dr. SW P.O. Box 40128 Olympia, WA 98504-0128 gtrautma@wutc.wa.gov

Carol Williams
Attorney General of Washington
Public Counsel Section
800 Fifth Ave., Suite 2000
Seattle, WA 98104-3188
carolw@atg.wa.gov

Sheila Harris
Integra Telecom of Washington, Inc.
1201 NE Lloyd, Suite 500
Portland, OR 97232
Sheila.harris@integratelecom.com

DATED this 8th day of March, 2007, at Seattle, Washington.



Carol Munnerlyn, Secretary