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October 31, 2005

By E-Mail and Federal Express

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

Re: Qwest Petition for Exemption, Docket No. UT-051488

Dear Ms. Washburn:

Integra Telecom of Washington, Inc. (“Integra”) and XO Communications Services, Inc. (“XO”) provide the following comments on the petition of Qwest Corporation (“Qwest”) for exemption from WAC 480-80-204(4) and treatment under WAC 480-80-204(3) (“Petition”). Integra and XO recommend that the Commission deny the Petition.

Qwest requests that it no longer be required to establish minimum price floors for its competitively classified services. Qwest, however, offers no means by which the Commission, customers, or competitors can determine whether Qwest is pricing such services above cost as required under RCW 80.36.330(3). The Commission rule adopts a practical implementation of this statutory requirement, requiring Qwest to establish a price floor so that all interested parties – not just Qwest – can recognize whether Qwest is pricing its competitively classified services above their cost. Qwest remains the market leader for all regulated services it provides within its Washington service territory. Elimination of the price floor requirement would deprive the Commission, affected consumers, and other service providers with the information they need to ensure that Qwest’s pricing reflects competitive conditions, not Qwest’s manipulation of the marketplace.

Qwest purports to justify its Petition on the grounds that none of its competitors are required to include price floors in their price lists, but none of Qwest’s competitors have captive ratepayers who can fund efforts to price services to other customers below cost. Qwest is subject to different regulatory requirements because Qwest is not a competitively classified company.

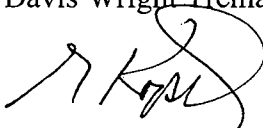
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Until that changes, the Commission should continue to require Qwest to provide sufficient information to the Commission to minimize Qwest's opportunities to leverage its monopoly power in more competitive service markets.

The Commission, therefore, should deny the Petition.

Very truly yours,

Davis Wright Tremaine LLP

A handwritten signature in black ink, appearing to read 'G. Kopta', with a large, stylized flourish that loops back over the signature.

Gregory J. Kopta