July 10, 2002

VIA ELECTRONIC MAIL AND FEDEX PRIORITY OVERNIGHT

The Honorable Lawrence J. Berg Administrative Law Judge WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION 1300 S. Evergreen Park Drive S.W. Olympia, WA 98504-7250

RE: REVIEW OF UNBUNDLED LOOP AND SWITCHING RATES AND DEAVERAGED ZONE RATE STRUCTURE WUTC DOCKET NO. UT-023003

Dear Judge Berg:

This letter responds to your request for clarification from the parties concerning the specific rate elements to be addressed in this docket. TRACER concurs with the list of rate elements submitted by WorldCom. In addition, to ensure consistency and compatibility of rates, the Commission should reexamine the rate elements listed in SGAT Section 9.3, Subloop and SGAT Section 9.7, Unbundled Dark Fiber (UDF).

Should you have any questions regarding the foregoing, please feel free to contact me.

Very truly yours,

ATER WYNNE LLP

ARTHUR A. BUTLER

AAB/gee Enclosure

cc: Parties on Service List