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January 25, 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. - Discovery Dispute -  
Reply

Dear Mr. Danner:

This letter will provide a brief reply to the Response to Complainants'  
Motion to Compel Responses to Discovery which is dated January 23, 2012.

A Supplemental Response to Data Request 1-8 was recently received.  
While that Supplemental Response is arguably not fully responsive, it has been  
determined to try to obtain the necessary information through additional data  
requests. Thus, the discovery dispute related to Data Request 1-8 should not  
be viewed as active at this time.

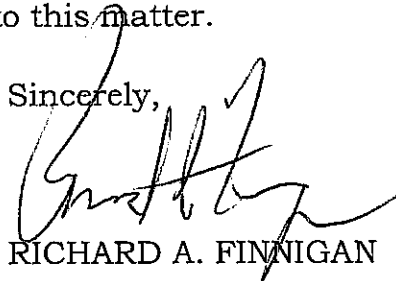
On the discovery dispute related to Data Request 1-7, it seems  
incongruous that parties can avoid discovery of agreements simply by saying  
that the agreements are confidential and may not be disclosed to any third  
parties. If that is an effective way of avoiding discovery, it can be assumed that  
all agreements would contain such language.

David Danner  
January 25, 2012  
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The Washington Independent Telecommunications Association and the Washington Exchange Carrier Association respectfully request that the Commission issue an order compelling full and complete responses to Data Requests 1-7 and the Third Set of Data Requests.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard A. Finnigan", written over the typed name below.

RICHARD A. FINNIGAN

RAF/km

cc: Service List  
ALJ Kopta (via e-mail)  
Clients (via e-mail)