

BEFORE THE WASHINGTON STATE
UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION,

Petitioners,

v.

ADVANCED TELECOM GROUP, INC.,
et al.,

Respondents.

DOCKET NO. UT-033011

DECLARATION OF
THOMAS L. WILSON, JR.

1 I, Thomas L. Wilson, Jr., under penalty of perjury under the laws of the State of
Washington, hereby declare and state as follows:

2 I am over 18 years of age and I make this declaration on the basis of my personal
knowledge, and if called upon to testify in this matter I could and would competently
do so as set forth herein.

3 I am a Senior Telecommunications Analyst employed by the Washington
Utilities and Transportation Commission. I am the same Thomas L. Wilson, Jr., who
caused to be pre-filed written testimony and exhibits to provide direct evidence in the
matter of the complaint about un-filed interconnection agreements in this docket. I

have studied in detail all of the facts and circumstances of the complaint and I have reviewed the Offer of Proof filed January 4, 2005, by Time Warner Telecom of Washington LLP (TWTC) in response to Order 19 in this docket.

4 Based upon my review of TWTC's Offer of Proof, TWTC has not offered any new information that has not already been filed in this docket. The Offer of Proof simply provides TWTC's interpretation of various bits of information that can be found in the filings in this docket. The information concerns several agreements between Qwest Corporation and two competitive local exchange carriers. For any carrier to show that it was harmed because the agreements at issue were not made available to it, that carrier must first show that it would fully adopt the terms and conditions of the underlying agreement for the time period that the discount is in effect. In this instance, a carrier would have to meet volume purchasing commitments in order to qualify for a discount. TWTC's Offer of Proof does not contain any information at all to show that TWTC would qualify for the discount by making the requisite volume purchase, or for what time period the discount would be applicable.

Thomas L. Wilson, Jr.

(Date signed)

(Place signed)