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Via Email and Overnight Delivery

February 22, 2008

Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S Evergreen Park Drive SW
P O Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Re: UT-073014 - *Rulemaking Concerning Telecommunications
Service (Line) Extensions*

On January 10, 2008, the Washington Utilities and Transportation Commission (“Commission”) provided notice to interested parties of the opportunity to file written comments on a set of draft rules for telecommunications service extensions (“Commission’s draft rules”). On February 11, 2008, the Commission granted an extension to the date for filing comments to February 25, 2008.

A coalition of telecommunications companies (“Coalition”) that filed initial comments and a draft rule in this rulemaking proceeding, determined that a consensus industry position on the Commission’s draft rules could be of significant assistance to both the Commission and to the industry. To that end, the Coalition has worked collaboratively to develop comments and proposed modifications to the Commission’s draft rules. The Coalition includes Verizon, Qwest, CenturyTel, Embarq, TDS Telecom, Kalama-Tenino Telephone and other Member Companies of the Washington Independent Telephone Association.

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The attached Coalition comments are such that proposed modifications to the Commission's draft rules are presented in 'redlined' format with proposed additions being underlined and proposed deletions being stricken-through. Immediately following each proposed modification, the comments provide a rationale for the modification in bracketed bold italics. The Coalition believes that the Commission's draft rules represent a well-reasoned approach to service extensions that reflects the realities of today's competitive telecommunications market. As such, the Coalition's comments deal mainly with administration of the draft rules and not the substantive nature of the rules.

The Coalition appreciates this opportunity to provide the Commission with an industry perspective on its draft rules. Finally, the Coalition would note that it has not taken leave in its attached comments to respond to the *Second Comments of Public Counsel* filed in this Docket on February 11, 2008. Should the Commission later decide to allow responsive comments, the Coalition will respond at that time.

Sincerely,

Mark S. Reynolds
MSR/jlr

Enclosure