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USWEST

Lisa A. Anderl
Senior Attorney

August 2, 1996

Steve King, Acting Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Dr. SW
PO Box 47250
Olympia, WA 98504-7250

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

RE: AT&T letter of July 23; request for letter
interpreting U-85-23

Dear Mr. King:

This is in response to the letter sent by AT&T on July 23, 1996, requesting an interpretation of the Eighteenth Supplemental Order in Cause U-85-23. AT&T has asked the Commission to determine that a local exchange company can route its Centrex customers' intraLATA toll traffic to a carrier other than U S WEST as the designated carrier, but may continue to route all other intraLATA toll to U S WEST.

U S WEST would simply point out that an informal letter ruling such as that requested by AT&T is not provided for in the Commission's procedural rules and would therefor not be a proper way to obtain an interpretation of the Eighteenth Supplemental Order. To the extent that AT&T seeks a declaratory ruling as to the applicability of that order to the circumstances described in the letter, the letter does not meet the requirements for a petition for declaratory order as set forth in RCW 34.05.240 and WAC 480-09-230.

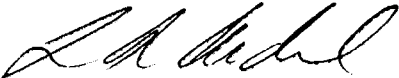
If the Commission were to determine that the Eighteenth Supplemental Order should be revisited in light of the significant regulatory and market changes since 1986, U S WEST asks that the Commission do so only through a proceeding that allows notice to, and participation by, all affected industry members.

Steve King
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Finally, while U S WEST does not wish to argue the merits of AT&T's request in this letter, U S WEST does feel constrained to note that the interpretation urged by AT&T is wholly unsupported by the terms of the Eighteenth Supplemental Order, or any reasonable interpretation thereof.

U S WEST is currently the designated intraLATA carrier for Ellensburg Telephone Company. Under the terms of the Eighteenth Supplemental Order, all 1+ intraLATA traffic must be routed to it by Ellensburg, unless that carrier elects to be its own toll carrier. Ellensburg cannot choose to route some traffic to U S WEST and some to AT&T. Ellensburg's Centrex service is a business local exchange service; it is not an unregulated private network, PBX-based service, as argued by AT&T.

Sincerely,



Lisa A. Anderl

cc: Ron Gayman, AT&T
Dick Petrone, U S WEST
Forrest Eastham, Ellensburg Telephone
Rick Finnigan, Ellensburg Telephone