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6 **BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

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8 In the Matter of

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10 Rulemaking Concerning Telecommunications
11 Service (Line) Extensions (WAC 480-120 and
12 480-123)

Docket No. UT-073014

COMMENTS OF UNITED STATES
CELLULAR CORPORATION AND RCC
MINNESOTA, INC.

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14 *I* United States Cellular Corporation ("U.S. Cellular") and RCC Minnesota, Inc.
15 ("RCC") support the Commission's draft rules for telecommunications service line
16 extensions. U.S. Cellular and RCC participated in this docket out of concern that the
17 Commission would extend its existing line extension rule to cover wireless carriers,
18 which currently is not the case. As U.S. Cellular and RCC explained in their September
19 20th comments, it would be discriminatory to apply the line extension rules to wireless
20 carriers, which cannot recover line extension costs through access tariffs as wireline
21 carriers may do. The Commission also lacks jurisdiction to extend the rules to wireless
22 carriers. The Commission's draft rules issued on January 10th are consistent with the fact
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1 that it is inappropriate to require wireless carriers to comply with the line extension
2 requirements, so U.S. Cellular and RCC support the draft rules.¹

3 Respectfully submitted this 25th day of February, 2008.

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12 Attorneys for United States Cellular
13 Corporation and RCC Minnesota, Inc.

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26 ¹ The rules only apply to companies required to file tariffs, which wireless carriers do not do. *See Notice of Opportunity Submit Comment on Draft Rules*, Docket UT-073014 (January 10, 2008).