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July 10, 2002

**VIA FACSIMILE AND ELECTRONIC MAIL**

Ms. Carole J. Washburn, Executive Secretary  
Washington Utilities & Transportation Commission  
1300 S. Evergreen Park Drive SW  
Olympia, WA 98504-7250

Re: Docket Nos. UT-023003 and UT-003013

Dear Ms. Washburn:

This is in response to the Commission's July 2, 2002, Notice allowing parties to file comments regarding the review of costs and rates established in Docket No. UT-003013 and the impact upon the scope of, and schedule in, Docket No. UT-023003.

In its Combined Petition for Reconsideration and Request for Clarification, Covad Communications Company ("Covad") identified three areas where additional proceedings are required in order to determine the rates, terms and conditions for (1) line splitting; (2) access to the line shared DLC loop UNE; and (3) unbundled packet switching. While Covad stated in its Combined Petition and Request that line splitting should be addressed in Part E of Docket No. UT-003013, Covad also believes that the line splitting issues appropriately can be determined in connection with Docket No. UT-023003. Covad continues to believe that the rates, terms and conditions for line sharing over DLC and unbundled packet switching should be determined in a separate proceeding.

Very truly yours,

K. Megan Doberneck

cc: All Parties (*via facsimile and U.S. Mail*)