

November 7, 2003

VIA ELECTRONIC MAIL AND U.S. MAIL

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
P.O. Box 47250
Olympia, WA 98504-7250

Re: *In the Matter of the Review of Unbundled Loop and Switching Rates and
Review of the Deaveraged Zone Rate Structure*
Docket No. UT-023003

*In the Matter of the Review of Unbundled Loop and Switching Rates; the
Deaveraged Zone Rate Structure, and Unbundled Network Elements,
Transport, and Termination (Non Recurring Costs)*
Docket No. UT-033034

Dear Ms. Washburn:

Public Counsel has no objection to the requests by Verizon and Qwest to remove its rate issues from these dockets. If they are removed, Public Counsel believes the recommendation to defer further cost proceedings until after the conclusion of the FCC TELRIC proceeding is reasonable, given the likely significance of the FCC rulemaking for UNE prices. The deferral of proceedings should also apply to the Staff's "core/fringe geographic deaveraging proposal" since it is not clear any purpose would be served by addressing that in isolation.

Sincerely,

Simon J. ffitc
Assistant Attorney General
Public Counsel Section
(206) 389-2055

SJf:cjw

cc: Service List (First Class Mail)