

Lida C. Tong
Director-Regulatory
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**GTE Service
Corporation**

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July 9, 1998

Ms. Carole J. Washburn, Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Subject: **GTE COMMENTS IN DOCKET NO. UT-970723**

Attached is a copy of the Comments of GTE Norwest Incorporated in the above-referenced matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'Lida C. Tong'.

Lida C. Tong
Director - Regulatory and Government Affairs

Attachment
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BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

PROPOSED RULEMAKING TO ADOPT)
A METHODOLOGY FOR DETERMINATION) NO. UT-970723
OF JUST AND REASONABLE RATES FOR)
ATTACHMENT TO TRANSMISSION)
FACILITIES)
_____)

COMMENTS OF GTE NORTHWEST INCORPORATED
ON WUTC'S REQUEST TO DEFER ACTION

GTE Northwest Incorporated ("GTE") hereby submits its comments in response to the Washington Utilities and Transportation Commission's (WUTC) request to defer action on the state rule process of its Statement of Intent (CR-101), in Docket UT-970723, dated March 31, 1998, pending FCC final rulemaking. GTE has previously submitted comments in this docket on January 15, 1998 and April 27, 1998.

GTE does not oppose the requested extension.

GTE's position regarding the methodology that should be adopted for determining just and reasonable rates remains unchanged from that put forth in its previously submitted comments:

- * There should not be a different rate formula for CATV than telecommunications providers.
- * Public utility and municipally owned utilities should be subject to the same pole and conduit rate formula, whether public or private.
- * Incumbent Local Exchange Companies (ILEC) and electric utilities should be required to use the same pole and conduit rate formula in their negotiations as that required by telecommunication providers and they should provide for equal treatment under the rate dispute process when such disagreements exists.

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