January 28, 2013

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th St., SW  
Washington, D.C. 20554

Re: Federal Communications Commission Docket GN Docket No. 12-353

Dear Ms. Dortch:

By Public Notice, DA 12-1999 released December 14, 2012 (the Notice), the Federal Communications Commission (FCC) established a pleading cycle on two petitions. One petition was filed by the National Telecommunications Cooperative Association (NTCA). The second petition was filed by AT&T. The two petitions offer different approaches for addressing the continuing transition to an IP based network.

These comments are filed on behalf of the Washington Independent Telecommunications Association (WITA) in response to the Notice. A list of WITA’s members is attached as Appendix A. WITA is a trade association that represents incumbent local exchange carriers operating within the state of Washington. In the NTCA petition, NTCA urged the FCC to seek comment on whether certain regulations should be eliminated, retained or modified to further the Commission's statutory objectives of consumer protection, competition, and universal service.¹

WITA supports the petition filed by NTCA. Every regulatory agency should periodically examine its rules to determine whether certain regulations should be eliminated, retained or modified to meet that agency's goals and objectives. This is particularly true at the present time with the ongoing evolution in telecommunications moving from a TDM based network to an IP based network. By initiating a rulemaking, the FCC will be able to be informed by the parties that are directly affected by current events as to which regulations are important to retain as we move forward and which should be eliminated or modified.

¹ NTCA Petition for Rulemaking to Promote and Sustain the Ongoing TDM-to-IP Evolution at p. 1 (filed November 19, 2012).
WITA urges the FCC to accept NTCA's Petition and initiate the rulemaking as called for by NTCA.

Thank you for the opportunity to submit comments.

Sincerely,

WASHINGTON INDEPENDENT TELECOMMUNICATIONS ASSOCIATION

By: Betty S. Buckley, Executive Director
APPENDIX A

Washington Independent Telecommunications Association Member Companies

Asotin Telephone Company d/b/a TDS Telecom
CenturyTel of Cowiche, Inc. d/b/a CenturyLink*
CenturyTel of Inter Island, Inc. d/b/a CenturyLink*
CenturyTel of Washington, Inc. d/b/a CenturyLink*
Ellensburg Telephone Company d/b/a FairPoint Communications
Frontier Communications Northwest, Inc.
Hat Island Telephone Company
Hood Canal Telephone Co., Inc. d/b/a Hood Canal Communications
Inland Telephone Company
Kalama Telephone Company
Lewis River Telephone Company, Inc. d/b/a TDS Telecom
Mashell Telecom, Inc. d/b/a Rainier Connect
McDaniel Telephone Co. d/b/a TDS Telecom
Pend Oreille Telephone Company, d/b/a RTI Pend Oreille Telecom
Pioneer Telephone Company
Qwest Corporation d/b/a CenturyLink*
St. John Co-operative Telephone and Telegraph Company
Skyline Telecom, Inc.
Tenino Telephone Company
The Toledo Telephone Co., Inc.
Western Wahkiakum County Telephone Company d/b/a Wahkiakum West
Whidbey Telephone Company
YCOM Networks, Inc. d/b/a FairPoint Communications

*The CenturyLink companies will be filing their own comments in this docket.