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December 27, 2006

VIA E-MAIL AND U.S. MAIL

Frances Nichols-Anglin
Oregon Public Utility Commission
PO Box 2148
Salem, OR 97308

Re: ARB 747 – Interconnection Agreement

Dear Ms. Nichols-Anglin:

On December 20, 2006, Qwest Corporation (“Qwest”) filed a proposed interconnection agreement in ARB 747 stating that it believes “that it is required to comply with the order [Order No. 06-637] by filing the interconnection agreement....” Qwest correctly notes that Beaver Creek Cooperative Telephone Company (“BCT”) “has not signed [the interconnection agreement] due to [BCT’s] pending petition for an extension.” It is important to note that BCT has not refused to sign the interconnection agreement.

Instead, BCT believes it is appropriate to determine whether BCT’s opt-in to the Ymax agreement docketed as ARB 780 is appropriate. BCT believes that its decision to opt-in to the Ymax agreement makes the proceedings in this docket, ARB 747, moot.

In addition, although Qwest did not state that BCT had refused to sign the agreement, Qwest asked the Commission to approve the interconnection agreement noting that the Commission has done so before “where one party does not sign, or refuses to sign, the agreement.” BCT wants it to be clear on the record that there should be no implication that BCT is refusing to sign the interconnection agreement; rather, it is procedurally inconsistent for BCT to sign an interconnection agreement when it has both requested an extension in

Frances Nichols-Anglin
December 27, 2006
Page 2 of 2

ARB 747 and opted in to the Ymax agreement in ARB 780.

BCT also notes that it is working on a petition for reconsideration in ARB 747. Therefore, it is premature to review and approve the interconnection agreement submitted by Qwest on December 20, 2006.

Thank you for your attention to this matter.

Sincerely,



RICHARD A. BINNIGAN

RAF/km

cc: Alex Duarte
Tom Linstrom