

September 23, 2003

Gary A. Evenson
Acting Administrator
Public Service Commission
P.O. Box 7854
Madison, WI 53707-7854

Re: Docket 05-TI-824 Comments

Dear Administrator Evenson:

This letter contains the comments of the Wisconsin State Telecommunications Association in this docket. These comments are submitted as an original and twenty copies.

The Wisconsin State Telecommunications Association requests full-party status in the above captioned docket.

Procedural Issues in the 90 day proceeding

The PSCW should not unilaterally initiate a 90-day proceeding. The FCC's finding that there was no impairment and therefore no need for unbundled switching using DS1 and higher loops should be sufficient. Deferring to this finding of the FCC saves substantial PSCW staff resources and those of the industry.

If a CLEC petitions for such a proceeding, it should file a verified petition support that request with sufficient factual basis to allow the PSCW to make the necessary factual findings and allow sufficient information for other parties to challenge the CLEC petition.

Further, the PSCW should set a date for any CLEC desiring to file such a petition and an opportunity for others to file verified responses and legal arguments challenging the CLEC petition. The date for the CLEC to file such a petition should be October 10, 2003. This will allow time for challengers to respond and the PSCW to review and address the petitions and counter petitions.

Procedural Issues in the 9 month proceeding

The PSCW should not commence a 9-month proceeding unless it receives a request from a LEC for such a proceeding. The proceeding should be a non-contested docket to allow the maximum amount of communications between the Commission and the participants in the docket. The docket should be limited to the geographic service area and services of the LEC(s) that are involved in the specific request. This limitation is justified due to significant ILEC diversity on a variety of levels including geography, economics, and size. Further, it will reduce the complexity and save on resources of the PSC staff and industry.

Respectfully submitted,

Nick Lester
Manager of Regulatory Affairs