

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

**Application of Winstar Communications,
LLC, and Certain of Its Subsidiaries to
Discontinue Domestic Telecommuni-
cations Services**

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) **WC Docket No. 04-284**
) **Comp. Pol. File No. 688**
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**To: Competition Policy Division,
Wireline Competition Bureau**

COMMENTS

Northwest Pipeline Corporation ("Northwest"), a wholly-owned subsidiary of Williams Gas Pipeline L.L.C., which in turn is a wholly-owned subsidiary of The Williams Companies, Inc. ("Williams"), by its attorneys and pursuant to Public Notice, DA 04-2442, released July 30, 2004 ("*Public Notice*"), hereby submits its Comments in the above-referenced proceeding. The Commission invited Comments to be filed by August 13, 2004.

In support of these Comments, the following is respectfully shown.

I.

BACKGROUND

The *Public Notice* advised that on July 15, 2004, Winstar Communications, LLC, and certain of its subsidiaries ("Winstar") filed an application, pursuant to Section 214(a) of the Communications Act of 1934, as amended, 47 U.S.C. § 214(a) and Section 63.71 of the Commission's Rules, to discontinue the provision of local, domestic and international long

distance, toll free, ATM, frame-relay, switched private line, and other high-speed data transmission services to non-federal customers in a number of locations nationwide.¹ Winstar stated in its application that it intended to discontinue the relevant services to customers for service locations outside of Oregon on August 31, 2004 and for service locations in Oregon on September 30, 2004. Section 63.71(c) provides that the application for discontinuance becomes automatically granted on the 31st day after the *Public Notice*.

Northwest will be directly impacted by this discontinuance and accordingly, it is filing its Comments in opposition to Winstar's proposed schedule. Northwest requests that the Commission notify Winstar that the grant will not be automatically effective on August 31, 2004. It further requests that the Commission require Winstar to extend the service period for Northwest until September 30, 2004.

II.

STATEMENT OF INTEREST

Northwest is part of the Williams natural gas pipeline transportation and storage system. Northwest is located in Salt Lake City, Utah and has 4,120 miles of pipeline. Its main offices are in Seattle, Washington and Portland, Oregon. The pipeline is a primary artery for the transmission of natural gas to the Pacific Northwest and Intermountain Region and is capable of handling 3.5 billion cubic feet of natural gas per day.

Winstar's services are an integral part of Northwest's transport and storage of natural gas. In particular, its services are critical to Northwest Pipeline's Gas Control and Supervisory Control and Data Acquisition ("SCADA") activities for regulating and monitoring the natural gas

¹ Northwest also received a Notice of Communications Services Discontinuance sent by Winstar on June 23, 2004.

as it flows through the pipeline. As such, Northwest is directly affected by Winstar's decision to discontinue its operations and it has standing to oppose the timeline for this discontinuance.

III.

DISCUSSION

A. Early Discontinuance Will Pose Risks.

The services provided to Northwest by Winstar include both high-speed and low-speed data circuits. Two circuits carry high-speed data to two of Northwest's sites, a compressor -- which is used to increase the pressure of the gas to push it to the next station along the line -- and a district office. The remainder of the Winstar circuits are low-speed, providing data service to and from 16 sites along the pipeline.

In addition to controlling the opening and closing of valves which is crucial to the proper operation of Northwest's high pressure natural gas pipeline, the Winstar transmission services provide essential data to Northwest on volume and gas pressure measurements; custody transfer of the natural gas to customers; and other monitoring activities.

If the data from the pipeline is lost due to an early discontinuance, Northwest's gas controllers would lose the ability to control pressures to much of the pipeline. This would result in the inability to move the gas efficiently through the pipeline. In addition, if the low speed data is compromised in any way, Northwest could miss receiving proper advance notice of pipeline breaks or equipment malfunctions, which could result in a life-threatening situation. Any circuit disruptions could impact Northwest's operations in Washington, Oregon, and western Idaho and would result in the inability to deliver the product to users.

In sum, early discontinuance could have a harmful effect on public safety, the consumer and business operations of Northwest Pipeline.

B. Northwest Is Working To Change Vendors.

While Northwest's project team is actively working with alternate vendors to replace Winstar's services, there is a strong possibility that the August 31, 2004 service deadline will not be met. Northwest has asked for and is receiving Winstar's assistance in working with the alternative vendors. However, there are certain factors that are currently out of Northwest's control, such as vendor circuit build timeframes and the possibility that some locations may have no alternative providers available, which would require Northwest to put a private network in place. Further, the alternative service providers that are working with Northwest are not willing to provide it with any guarantees that replacement service will be in place by August 31. If Northwest does not have a vendor for even one circuit on August 31, the operation of the entire pipeline could be compromised.

Therefore, it is respectfully requested that the Commission not permit Winstar's discontinuance to be deemed automatically granted on August 31, 2004 as allowed by Section 63.71(c) of the Commission's Rules. Northwest requests that the Commission notify Winstar that it must extend service to the pipeline until September 30, 2004.

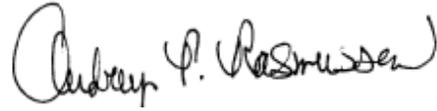
IV.

CONCLUSION

WHEREFORE, the above premises considered, Northwest Pipeline respectfully asks that the Commission consider its Comments in the above-referenced proceeding and grant its requests.

Respectfully submitted,

NORTHWEST PIPELINE CORPORATION

A handwritten signature in black ink that reads "Audrey P. Rasmussen". The signature is written in a cursive style with a large initial 'A'.

Audrey P. Rasmussen
ITS ATTORNEY

HALL, ESTILL, HARDWICK, GABLE, GOLDEN & NELSON, P.C.
1120 20th Street, N.W.
Suite 700, North Building
Washington, D.C. 20036-3406
Telephone (202) 973-1200
Facsimile (202) 973-1212
Dated: August __, 2004

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CERTIFICATE OF SERVICE

I, Gladys L. Nichols, do hereby certify that on this 11th day of August, 2004, a true and correct copy of the above and foregoing **COMMENTS** was sent by U.S. Mail, with proper postage thereon fully paid, to:

Ms. Carmell Weathers
Competition Policy Division
Wireless Competition Bureau
Federal Communications Commission
445 12th Street, S.W., Room 6-A207
Washington, D.C. 20554
(Via Facsimile @ (202) 418-2345)

Joseph M. Sandri
Senior Vice President & Regulatory Counsel
Winstar Communications, LLC
1850 M Street, N.W.
Suite 300
Washington, D.C. 20036

Kimberly Bradley, Esquire
Winstar Communications, LLC
1850 M Street, N.W.
Suite 300
Washington, D.C. 20036

Jean L. Kiddoo
Brian McDermott
Swidler Berlin Shereff Friedman, LLP
3000 K Street
Suite 300
Washington, D.C. 20007

/s/ Gladys L. Nichols _____