

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

IN THE MATTER OF WASHINGTON TELEPHONE }
ASSISTANCE PROGRAM RULEMAKING } DOCKET NO. UT-003074

**COMMENTS of the
LOW INCOME TELECOM PROJECT**
August 22, 2001

I. Introduction

The Low Income Telecommunications Project (LITE) respectfully submits these comments in response to the Washington Telecommunications and Transportations Commission’s August 1, 2001 Notice of Proposed Rulemaking. LITE, which was recently created, is a collaborative program of Washington’s Community Action Agencies (CAA), funded by the Seattle Foundation, and lead by Spokane Neighborhood Action Programs (SNAP). In the year 2000, Washington CAAs provided services to over 150,000 low income and vulnerable families. CAAs advocate for programs, policies, and resources that maximize individual capacities and promote strong communities. Our strong belief is that basic telephone service for all is a prerequisite if low income and vulnerable families are to reach their potential and thrive in safe and strong communities. One of our primary goals is to increase participation in the Telephone Assistance Program to the highest level possible.

A review of the current participation rate in WTAP reveals that the current percentage of eligible consumers enrolled in WTAP needs to be substantially increased. We support the following efforts to streamline the enrollment process and increase participation in WTAP:

- a) Automatic enrollment;
- b) Coordination with DSHS, community groups, tribal organizations, community voicemail organizations and other stakeholders to increase participation in the program; and
- c) Increased outreach and media campaigns to publicize the program.

II. Comments

1. We support the ability of wireless telecommunications providers to participate in the program. We also support the proposed rule change requiring all ETC and non-ETC local exchange companies to offer telephone assistance rates and discounts. We think that the clear intent of the relevant law is that all qualified residents of Washington should be able to participate in the telephone assistance program. We oppose any threshold under which carriers are exempt from offering the reduced WTAP rates. If a consumer meets program eligibility requirements, they should have the opportunity to participate in the program. Therefore, it is our recommendation that the language, "... when 100 or more of its access lines are subscribed to for residential service," in the third sentence of proposed WAC 480-122-020, be deleted from the final rule. The commission can provide exemptions to this requirement should a telecommunications provider show actual harm from having to comply with the rule.

2. The Commission's Notice dated August 23, 2000 sought comment on whether the rule should be modified to include minimum requirements of ILECs, CLECs, and resellers for outreach. We strongly support requirements for effective outreach. We have reviewed all of the comments submitted by the Public Counsel of the Attorney General's Office and enthusiastically support the proposals made by the Public Counsel's Office. We would also welcome the chance to work with the telephone companies, DSHS, community groups, and others to develop strategies to increase enrollment in the program.

We think that at the very minimum Telecom companies offering WTAP should be required to train all customer service and billing representatives in identifying potential enrollees in WTAP. Customers with delinquent bills should always be informed of the WTAP program. The companies should be required to work with all stakeholders to develop a strategy to increase participation in WTAP. Finally, the companies should have to present evidence that they are complying with the FCC order that requires them to "publicize the availability of Lifeline and Link Up services in a manner

reasonably designed to reach those likely to qualify for those services.”¹ Therefore, we propose that the final sentences of WAC 480-122-020 contain the following language in the final rule:

Every telecommunications company participating in the Washington telecommunications assistance program shall publicize the availability of the program in a manner reasonably designed to reach those likely to qualify for the service. Every telecommunications company participating in the Washington telecommunications assistance program shall train all its customer service and billing representatives to identify those who may qualify to participate in the telephone assistance program and enroll people in the telephone assistance program. Within sixty days of the issuance of this rule, and bi-annually thereafter, every telecommunications company participating in the Washington telecommunications assistance program shall report to the commission on its efforts and strategies to publicize the telephone assistance program.

III. Conclusion

LITE supports the efforts of the commission to increase participation in the WTAP program. We look forward to working with all those interested in making the program a success and a valuable tool for Washington’s large low-income population. Thank you for the opportunity to submit these comments.

Dated this 22nd day of August, 2001

Sincerely yours,

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¹ Twelfth Report and Order, Memorandum Opinion and Order, and Further Notice of Proposed Rulemaking, CC Docket No 96-45, FCC 00-208 (released June 30, 2000), para 79.

