

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to Consider Revisions to) DOCKET UT-100148
WAC 480-120-264(5)(a) Prepaid Calling)
[Card] Services, Docket UT-100148) **AT&T Communications of the Pacific**
_____) **Northwest, Inc.**

In response to the notice of opportunity to file written comments filed by the Washington Utilities and Transportation Commission on February 17, 2010 in Docket UT-100148, AT&T Communications of the Pacific Northwest Inc. (“AT&T”) hereby submits the following comments.

All pleadings, correspondence, and other communications concerning this docket should be sent to the following addresses:

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INTRODUCTION

On February 17, 2010, the Washington Utilities and Transportation Commission (Commission) filed with the Code Reviser a Preproposal Statement of Inquiry (CR-101) to consider the need to implement additional consumer protection disclosures in WAC 480-120-264(5)(a), the Prepaid Calling [Card] Services rule. The Commission specifically requested that interested persons address whether new subsections should be added to WAC 480-120-264(5)(a), as follows:

- (1) The disclosure of rates, terms, and conditions must be made in the language in which the card is advertised.

- (2) The number of minutes contained on the card must be disclosed on the card or its packaging.

The Commission also requested additional information to the extent that either of these potential changes will cause additional costs on any regulated company.

RESPONSE

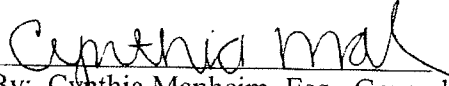
AT&T has an interest in this proceeding as it is a provider of prepaid calling card services. AT&T appreciates the opportunity to comment in this matter and submit the following comments on the two specific proposed changes to the existing rule.

Disclosure of Rates, Terms and Conditions in Language Advertised: AT&T does not oppose the addition of this requirement and offers no further comments regarding this proposed addition to the rule.

Disclosure of Number of Minutes on Card or Packaging: AT&T proposes that this requirement be broadened so that it requires the disclosure of the value of the prepaid calling services – either in dollars or minutes – on the card or its packaging. Some of AT&T's prepaid calling cards provide the dollar value of the card along with information so that the customer can easily determine the equivalent number of minutes that can be purchased with the card. The number of minutes that any card will provide may vary depending on how the card is utilized – e.g., for state-to-state calling, international calls, and/or calls initiated from pay phones. The disclosure of the dollar value of the card along with the methodology that can be employed to determine the number of minutes for any calling scenario provides the consumer with clear disclosure of the value of the card.

AT&T will participate in any future workshops, hearings or additional briefings as might occur in this proceeding.

Submitted this 22nd day of March, 2010



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