

While I want to thank you for your efforts in the difficult process of the current telecom rulemaking process, please consider the merits of the following:

WAC 480-120-104 Information to Consumers

Please change the word "or" to "and" in WAC 480-120-104, Information of consumers, to read:

- 6) (f) "and" must inform the customer that additional information pertaining to local exchange service may be found in the consumer information guide of the local telephone directory as required in WAC 480-120-251.

Please recognize the need to change "Customer Complaints." Please demonstrate support for complaint tracking and the proposal for customer service performance measures submitted on March 12, 2002 shown below:

480-120-16X Company performance standards for complaints and disputes.

- 1) The following standards for processing complaints apply:
 - a) For service-affecting complaints the company must promptly investigate the complaint
 - i) within five business days after the initial complaint, have investigated and closed ninety percent of complaints received each month.
 - ii) within ten business days after the initial complaint, have investigated and closed ninety-nine percent of the complaints received in one month.
 - iii) within one month after the initial complaint, have investigated and closed 100% of the complaints received in one month.
- 2) For non-service affecting complaints the company must promptly investigate the complaint
 - a) within five business days after the initial complaint, have investigated and closed eighty percent of complaints received each month.
 - b) within ten business days after the initial complaint, have investigated and closed ninety percent of the complaints received in one month.

- c) Within two months after the initial complaint, have investigated and closed 100% of the complaints received in one month.
- 3) For purposes of determining the amount of penalties that shall apply if a LEC fails to complete complaint investigations required by subsections (1)(a), (b), and (c) of this section, each complaint that the LEC fails to investigate and close in excess of the highest number of uncompleted orders that would not have triggered a violation shall be a separate violation.

Telecom Consumer Bill of Rights

Senior Rights Assistance, a member of the Telecommunications Consumer Education Consortium, strongly urges the Commission to support and enact the Consumer Bill of Rights. Many other states have such consumer protections in place and we feel that our residents deserve no less. The Bill of Rights has been dismissed in the recent past due to the fact that the "rights" are already in place. Much evidence exists to indicate to all, but those few still in denial, that customers are at a disadvantage in dealing with large telephone companies. Our state Attorney General's office has the statistics to prove that our residents feel abused and betrayed by current practices. A readily accessible tool such as the Consumer Bill of Rights will provide consumers with information to protect their rights as well as accept their responsibilities in this matter.

Credit Reports

Because the telecom companies are excellent at marketing their ancillary services, the limitation of credit reports to only those customers who receive ancillary services is actually quite broad. There is not necessarily a correlation between credit reports and utility bill payments. In addition, the phone companies are notorious in the numbers of "bad credit" complaints they themselves generate, when oftentimes these past due amounts are disputed by the customers.

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