



Sprint reiterates its comments from March 21, 2002, that presently no company will be able to comply with WAC 480-120-061(8), which requires companies to release phone numbers to a customer who is transferring service to another telecommunications company if the new provider is outside the first company's rate center. Number portability beyond the rate center is technologically infeasible. In recognition of this limitation, the rule should be modified by adding the words, "within the same rate center."

#### **480-120-104 Information to consumers**

This latest draft of the proposed rules includes the new requirement that confirmation letters to customers for both initial and changed service include a TTY number and the rates of the services being provided.

As for the TTY requirement, Sprint has no objection to informing customers of a TTY number when they initially apply for service. After that, however, customers will already have all the information necessary because of their ongoing relationship with the company including the phone book, notices, bills, etc. that they receive.

Sprint is most concerned the commission has decided to add back into the rules at the eleventh hour of this proceeding the burdensome requirement of including rates without providing the industry an additional opportunity to discuss the ramifications. This requirement was originally contained in the August 23, 2001 draft, but was later removed in the February 14, 2002 draft after extensive discussion between the industry and Commission. As discussed during the workshops, the requirement is significantly burdensome and costly. The same service may have different rates, sometimes even a different rate structure, from state to state. For Sprint, the action necessary to specify state-specific rates within the text of the letter would require a four- to six-month programming effort costing several thousands of dollars. Sprint currently relies on the first bill to provide this information to the customers and has no evidence that this procedure is inadequate.

Additionally, there would be ongoing maintenance and cost in order to keep abreast of changes in pricing over time. That is because Sprint uses an external vendor to produce the confirmation letters for all of Sprint's operations throughout 18 states. The vendor does not currently have access to Sprint rate tables. Providing access to Sprint's rate tables, or to a separate rate table that would be maintained specifically for Sprint's Washington operations, would require significant revision of in-place programming. Such programming would increase processing of the nightly file, slowing down the overall production process (fewer pieces per hour) and would likely increase overall prices per packet. If for security or efficiency reasons it is determined that a separate rate table should be maintained for Washington, rather than giving the vendor access to all of Sprint's rate data base, certain safeguards would have to be built in to ensure the most current rates are applied in consideration of all the options selected by the customer. The risk of misquoting rate is very significant.

Additionally, adding prices to the letters would require production of an additional set of messages unique to WA customers.

For all of the foregoing reasons, Sprint urges the Commission to eliminate the last minute additional requirement that a TTY number be added to confirmation letters and go back to the last revision of the rule that eliminated the need to include rates in the confirmation letter. At a minimum, the industry should be given more opportunity to discuss the issues with the Commission.

#### **480-120-107 Installation and activation credits**

Sprint appreciates that the WUTC has modified this rule so that companies will not be penalized for missing an installation appointment if the order is worked the day the order is taken or the day following. Sprint continues to hold the opinion that companies should be given the flexibility to craft their own customer credit plans, since such business practices are a key means of competitive differentiation, and a uniform

approach is not responsive to the different needs of different markets. We therefore ask once again that the Commission reconsider its uniform approach and provide companies with the option of filing not just additional service quality guarantees as permitted in (4), but a service quality guarantee program of the company's own design/s in lieu of (2). Since the company would be filing its plan for Commission approval, the Commission would have the opportunity to negotiate changes or reject the company's plan if they felt it was inadequate.

**480-120-122 Establishing credit—Residential services**

Sprint appreciates the Commission's modification to (5)(b) which no longer requires the company to remove toll restriction if the customer wants to retain toll restriction.

**480-120-133 Response time for calls to business office or repair center**

Measuring response time on a weekly basis is excessively burdensome, non-standard and inconsistent with WAC 480-120-535. Moving from monthly to weekly creates more work, more paper, more analysis by Commission staff, and more cost. There has been no evidence to suggest that a weekly report is a better representation of company performance than a monthly report. Sprint urges the Commission to continue to monitor response time on a monthly basis and not create additional paper flow.

**480-120-161 Form of bills**

Sprint remains confused about the meaning of (2)(b) with respect to third party billing. It is not clear whether when Sprint serves as the billing agent for a company that sends through for delayed charges, whether Sprint would be required to offer extended payment arrangements. If so, Sprint will incur the cost of major billing system changes and will need to renegotiate all of its billing and collection contracts. We urge the Commission to modify the rule to limit the company's obligation to extend the payment

period to instances for which the company has control and not hold companies responsible for the actions of others.

**480-120-162 Cash and urgent payments**

Sprint continues to believe that payment agencies are an anachronism in today's environment. The cost expended for the convenience of the very few customers who continue to use a payment agency is no longer warranted as an expense the entire rate base should bear, especially when there are so many inexpensive alternatives to making a payment at a payment office. Additionally, the rules regarding notification of disconnection ensure that customers have adequate warning if service is in jeopardy so they may make urgent payments by mail or electronically.

**480-120-439 Service quality performance reports**

Sprint is compelled to ask again that the requirement that the company track and report monthly repair jobs for which permits are needed be eliminated. Normally any repair job is going to be on facilities for which Sprint already has a permit. While there are rare, emergency repair jobs that require an additional permit of some kind, it is Sprint's policy to get the customer back into service—with wire lying on the ground if necessary—and then obtain the additional permit. This can be done because existing facilities were placed after securing a permit. In taking this proactive approach, Sprint never has a repair job delayed by the need for a permit, and thus does not track repair jobs that require permits. The new rule creates new record keeping requirements without providing information that is germane to the amount of time required to restore service. Sprint therefore asks the Commission to eliminate this requirement.

Respectfully submitted this 27<sup>th</sup> day of June, 2002, by

---

Nancy L. Judy  
State Executive – External Affairs