



Qwest Corporation
1600 Seventh Avenue, Suite 3200
Seattle, Washington 98191
Phone: 206-345-5921

Lisa Espinosa
Manager – Regulatory
Policy & Law

August 22, 2001

Carole Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
1300 South Evergreen Park Drive SW
Olympia, Washington 98504-7250

Attention: Kristen Russell

Re: Docket No. UT-003074
Chapter 480-122 WAC – Washington Telephone Assistance Program

Dear Ms. Washburn:

Qwest Corporation appreciates the opportunity to submit comments in the Washington Utilities and Transportation Commission's Notice of Proposed Rulemaking (CR-102), dated August 1, 2001. Qwest recognizes that the call for written comments requested the comments be filed by August 22, 2001. Qwest respectfully requests that the Commission consider these comments even though they are filed a day late. Pursuant to the Commission's request, a copy of these comments is being sent by electronic mail.

Qwest commends Staff in their effort to streamline the rules associated with the telephone assistance program within the State of Washington, in accordance with the Governor's Executive Order, 97-02. Qwest generally concurs with the amendatory and repealed sections proposed by Staff.

Qwest continues, however, to respectfully request that WAC 480-120-020 apply to all carriers, Incumbent Local Exchange Carriers, ("ILEC's"), Competitive Local Exchange Carriers ("CLEC's"), and resellers serving residential customers in accordance with the state statute. RCW 80.36.420 (3)(a) states, "The Commission shall establish a *single* telephone assistance rate for *all* local exchange companies operating in the state of Washington..." The statute does not allow the Commission to establish a threshold level, whereby only certain local exchange carriers – those serving a hundred (100) or more residences participate in the WTAP program.

Washington citizens should be afforded the luxury of obtaining basic affordable telephone service from a provider of their choice irregardless of the number of residential customers that carrier provides service to. Consistent with RCW 80.36.420, Qwest respectfully requests that all providers of residential service be obligated to offer a telephone assistance program and that the proposed threshold language be removed from the rules.

If you have any questions regarding Qwest's comments in this matter, please do not hesitate to contact me at (206) 345-5921.

Sincerely,

Lisa Espinosa

Enclosures