

**BEFORE THE**  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

UT-980675

Rules relating to WAC 480-120-139, ) Changes in local exchange and ) intrastate toll services )	) COMMENTS OF SPRINT CORPORATION ) ON BEHALF OF SPRINT COMMUNICATIONS, L.P., ) AND UNITED TELEPHONE COMPANY OF ) THE NORTHWEST
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Sprint Corporation, on behalf of Sprint Communications, L.P., and United Telephone Company of the Northwest d.b.a. Sprint (“Sprint”), submits these comments in response to the June 21, 1999, “Notice of Opportunity to Submit Written Comments on Proposed Rules” in this docket.

Sprint compliments WUTC staff on their intention to adopt rules consistent with the FCC anti-slamming rules. While the WUTC’s proposed methods for the verification of carriers track the FCC’s regulations, there are two areas where the WUTC rules appear to be inconsistent with the FCC’s.

Initially, Sprint notes that in contrast to the preferred carrier freeze in Section 4 of the WUTC’s proposed rules, the FCC does not mandate offering preferred carrier freezes. Rather, it set forth rules for companies choosing to offer such freezes. Also, the FCC does not mandate customer notification of the availability of preferred carrier freezes, and Sprint opposes such a requirement.

Sprint opposes mandatory notification of the availability of a preferred carrier freeze at the time service is ordered for several reasons: First, the notice requirement places an undue burden on carriers like Sprint that operate in many jurisdictions and process orders on a national basis from a central location. For example, under the WUTC’s proposal, a call from a Washington customer will require different handling by Sprint’s call center operators than a call from other states that have

no such notification requirements.

Second, this additional information will potentially increase wait times for other Washington customers as more time is spent with new customers informing them of the PIC freeze option. Sprint notes, however, that it is not opposed to providing notice of the PIC freeze option in a bill message.

Third, promotion of local carrier freezes could easily be used by the incumbents to prevent potential competitors from making inroads into this market just as competition begins to evolve for local service.

With reference to the "Remedies" section (5) of the WUTC's existing rule, it should be noted that the liability section of the order in FCC Docket 98-334 was temporarily stayed at the U. S. Court of Appeals for the District of Columbia on May 18, 1999. The liability administration issue is being addressed at the federal level and is expected to be resolved in the near future. AT&T, Sprint, MCI Worldcom and other industry leaders have presented the FCC with a proposal for a neutral third party liability administrator. This proposal is currently being evaluated. Accordingly, Sprint requests that the WUTC monitor the situation at the national level and then modify Section 5 to conform to the FCC liability rules when those rules become effective.

In conclusion, Sprint's recommends the WUTC adopt rules that are identical to the non-stayed portion of the rules adopted by the FCC in this matter and later make any revisions necessary to conform existing rules to the stayed portion of the rules after they are finalized.

Respectfully submitted this 15<sup>th</sup> day of July, 1999, by

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Nancy L. Judy

Assistant Vice President – External Affairs  
Sprint  
902 Wasco Street  
Hood River, OR 97031

Eric S. Heath, Attorney  
Legal & External Affairs Dept.  
Sprint  
330 S. Valley View Blvd  
Las Vegas, NV 89107