

The justification Qwest puts forth seeking modification of subsections (1) and (8) are without merit. We respectfully suggest that unless Qwest is forced to track complaints that are not filed with the Commission, the record of complaints is seriously and intentionally skewed. First, many consumers are not informed of the process whereby they can file a complaint with the WUTC. Second, what is the likelihood that a complaint to the company would reach an executive? We have called Qwest from our office on behalf of clients; to my knowledge we were never offered the option of speaking with an executive. The reason complaints to executives can be tracked while others cannot is due to the design of their tracking system, a system that was designed by Qwest to meet its needs. Surely the company has the capability and the capacity to expand its tracking system to capture those complaints now lost. The statement that such a system cannot be created without "extraordinary additional expense" may reflect the magnitude of the problem.

We request that the wording for WAC 480-120-166, subsections (1) and (8) remain as proposed.

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