

Dear WUTC:

I have been listening to today's oral comments on the bridge line. In lieu of submitting oral comments at today's hearing, please consider the following on behalf of the Low Income Telecommunications Project (LITE):

WAC 480-120-122:

LITE submitted language in its comments dated June 27, 2002 that would clarify that customers enrolled in WTAP or enhanced tribal lifeline would not be subject to the deposit requirements in 480-120-122(1)(a) through (e). Those comments are attached here. The first sentence of RCW 80.36.460 (Washington Telephone Assistance Program -- Deposit waivers, connection fee discounts) supports this position where it reads: "Local exchange companies shall file tariffs with the commission which waive deposits on local exchange service for eligible subscribers...." The statute makes no mention of the exceptions mentioned in the current draft rule (480-120-122(1)(a) through (e)). By way of avoiding confusion we ask that the Rule contain language at least similar to the language suggested in our comments date June 27, 2002.

WAC 480-120-174:

LITE supports adding the language to the rule as suggested by the staff in there memo dated 7/25/02.

LITE Endorses Comments:

LITE also endorses the comments made at the hearing today by Robert Cromwell of Public Counsel, Tracey Rascon of ATNI-EDC, Andrea Abrahamson of WAPAS, and Sandra Ripley on behalf of Senior Services.

Thank you for all your hard work on theses rules.

Sincerely yours,

John O'Rourke  
Coordinator, Low Income Telecom Project  
Spokane Neighborhood Action Programs  
212 W. 2nd Avenue  
Spokane, WA 99201  
(509) 744-3370, ext. 247