

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

UT-990146

Telecommunications Companies)
Chapter 480-120 WAC)

COMMENTS OF SPRINT CORPORATION

Sprint appreciates the opportunity to comment further on the proposed technical rules as part of the general telecommunications rulemaking. Sprint does not at this time have comments on all the topics set forth by the staff in their minutes of the April 18 and May 15, 2000, workshops and will not repeat comments already on the record. We reserve the right, however, to provide supplemental comments on these topics in the future.

WAC 480-120-500 Service Quality

Sprint is concerned about the new requirement concerning availability of comparable services. Typically new advanced services are introduced in the largest exchanges first and then the rest of a company's territory as demand dictates and budget permits. If this proposed new language were interpreted to mean that a new advanced service could not be introduced at all until it could be introduced ubiquitously, this could severely reduce the number of new services available to customers or at least seriously delay their introduction. Sprint does not believe the "comparable services" language of the 1996 Telecommunications Act was intended to result in fewer or delayed services for rural customers.

WAC 480-120-515 Network Performance Standards

Sprint objects to the changes in this section from engineering design standards to performance standards. It's one thing to design a network according to prudent

engineering design standards based on the best available forecasts. It's another thing entirely to design a network guaranteed to maintain a specific minimum level of performance in all circumstances. This would be a fundamental change of standards and the net effect would be an increase in cost to the companies and, ultimately, end users. A company must design to a higher standard if it is to guarantee a minimum performance. No evidence has been presented to support this change either from an economic or public policy standpoint.

WAC 480-120-X08 Service Quality Guarantees

Service quality guarantees similar to the ones proposed here have been imposed on only one company in Washington and that imposition was the result of a lengthy adjudicated procedure. The service quality guarantees imposed were clearly, in the context of that proceeding, a sanction resulting from the company's past performance. That the staff should propose that all companies in the state be treated as if they had similar past performance is entirely inappropriate and Sprint objects strenuously. We have no systems in place and no personnel available to develop and administer a system of guarantees such as is proposed here. There is absolutely no justification for burdening Sprint and other companies that already provide consistently good service with a totally new set of requirements that can only rob resources from that provision of service.

This rule clearly does not comport with the Governor's guidelines of need or effectiveness and efficiency. Except as a sanction, service guarantees such as these should be offered at the company's discretion.

Respectfully submitted this 15th day of June, 2000.

SPRINT CORPORATION

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