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STATE OF WASH.
UTIL. & TRANSPORTATION
COMMISSION

WT-900726

1063 S. Capitol Way #219
Olympia, WA 98501

October 3, 1990

Mr. Paul Curl, Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr. SW
Olympia, WA 98501

RE: AOS RULEMAKING

The proposed Alternate Operator Service rulemaking adequately addresses the charges imposed by in-state companies on calls originated in this state. The rulemaking should be adopted.

It does not provide any protection whatsoever to consumers who use calling cards issued by AT&T or their local exchange company, thinking the calls will be billed at prevailing rates, later to find that they are charged much higher rates. The rule which I originally proposed would have barred local exchange companies from providing billing and collection services to "high cost carriers" [as defined] on the same billing number as they provide billing and collection services to "low cost carriers." That protection can and should be provided and the proposed rulemaking is incomplete without it.

I offer the following specific comments on the details of the proposed rulemaking:

480-120-138

- (11) Clarify that the requirement that all one-way service telephones be so marked regardless of whether they meet the library exemption, the law enforcement exemption, or the date exemption. It's really frustrating to wait for a call back at a pay phone and never have it ring.
- (12)(a): The word "or" should read "and"
- (12)(b): The 1-800 requirement should be extended to cover 950-numbers.

480-120-141

- (3)(a) Increase the point size to at least 10 point of the language reading:
YOU HAVE THE RIGHT TO REQUEST THAT THE OPERATOR CONNECT YOU WITH THE CARRIER OF YOUR CHOICE AT NO CHARGE.

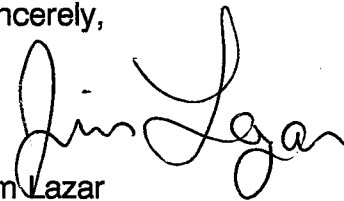
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- (5)(a) Require that the complete name of the AOS company be divulged. "ITI Operator" does not communicate as clearly as "International Telecharge Incorporated" does.
- (5)(e) Seattle may have "heaving" traffic, but telecommunications companies typically do not.

I hope that these comments are constructive additions to the debate now before the Commission. I urgently encourage prompt action to protect consumers from the hidden charges which AOS providers are currently imposing.

If you or your staff have any questions, I can be reached at 786-1822.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Lazar". The signature is fluid and cursive, with the first name "Jim" and last name "Lazar" clearly distinguishable.

Jim Lazar
Consulting Economist