



Cynthia Manheim
General Attorney

16331 NE 72nd Way
Redmond, WA 98052

T: 425-580-8112
F: 425-580-8333
cindy.manheim@att.com

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Via Web Portal

Steven King
Executive Director and Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket UT-140680

Enclosed for filing are comments by AT&T Corp., New Cingular Wireless PCS, LLC, and Teleport Communications America, Inc. (collectively "AT&T") in the above mentioned docket.

Sincerely,

Cynthia Manheim by Doc with permission

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**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to consider amending rules in)
WAC 480-120, Telephone Companies,) **Docket UT-140680**
WAC 480-121, Registration and)
Competitive Classification of)
Telecommunications Companies, WAC)
480-122, Washington Telephone)
Assistance Program, WAC 480-123,)
Universal Service, WAC 480-140,)
Commission General – Budgets, and)
WAC 480-143, Commission General –)
Transfers of Property, due to competitive)
changes within the telecommunications to)
meet consumer, commission and industry)
requirements no longer applicable under)
the existing WAC rules)
_____)

COMMENTS OF AT&T

In response to the notice of opportunity to submit written comments on proposed rules and notice of proposed rule adoption hearing by the Washington Utilities and Transportation Commission on December 5, 2014, AT&T Corp., New Cingular Wireless PCS, LLC, and Teleport Communications America, Inc. (collectively “AT&T”) hereby submit the following comments.

I. Introduction

AT&T appreciates the opportunity to submit comments in this rulemaking proceeding. AT&T has only limited suggested modifications to the current proposed rules.

II. Suggested Modifications to Proposed Rules

a. Suggested Modification to WAC 480-123-070(1)(a) and WAC 480-123-080

As the Commission has not adopted AT&T's previous suggestion to eliminate the Washington-specific reporting requirements and instead rely on the Form 481 that all eligible telecommunications carriers ("ETCs") are required to file with the state, AT&T is concerned about the addition of the following sentence to WAC 480-123-070(1)(a) and -080:

...The report must include the Company's [budgeted] gross capital expenditures and maintenance expense for the preceding [coming] calendar year along with a description of major projects and affected exchanges.

AT&T recommends deleting this sentence as it could be read to require reporting on capital expenditures and maintenance expenses beyond the federal high cost support received by the ETC. Alternatively, this sentence should be limited to the expenditures (capital and operating expense) made with the federal high-cost support received by the ETC. Another alternative would be to limit this sentence so that it only applies to local exchange carriers ("LECs"). The Commission does not have general jurisdiction over wireless carriers and does not have the ability to review general capital expenditures and maintenance expenses that are not related to universal service support. AT&T, however, supports the requirement to provide detailed information on capital expenditures and maintenance expense related to the receipt of federal universal service support.

b. Clean-ups:

- 480-120-439(1) should be revised to reflect the repeal of 480-120-105 and -112.

All companies must retain, for at least three years from the date they are created, all records that would be relevant, in the event of a complaint or investigation, to a determination of the company's compliance with the service quality standards established by ~~WAC 480-120-105 (Company performance standards for installation or activation of access lines), 480-120-112 (Company performance for orders for nonbasic services),~~ 480-120-133 (Response time for calls to business office or repair center during regular business hours), 480-120-401 (Network performance standards), 480-120-411 (Network maintenance), and 480-120-440 (Repair standards for service interruptions and impairments, excluding major outages).

- 480-120-439(2) (previously 480-120-439(5)) should be revised to reflect the change to the numbering of this section.

Notwithstanding subsections (1) ~~and (2)~~ of this section, any company experiencing a major outage that lasts more than forty-eight hours must provide a major outage report to the commission within ten business days of the major outage...

III. Conclusion

AT&T commends the Commission for considering changes to existing rules that would address competitive changes within the telecommunications to meet consumer, commission and industry requirements that are no longer applicable.

Submitted this 6th day of January, 2015

Cynthia Manheim by Doc with permission

By: Cynthia Manheim, WSBA# 26524
Representing AT&T Corp., New Cingular Wireless PCS,
LLC, and Teleport Communications America, Inc.
PO Box 97061
16331 NE 72nd Way
Redmond, WA 98073-9761
Telephone: (425) 580-8112
Facsimile: (425) 580-8652
Email: cindy.manheim@att.com