

August 20, 2001

Carole Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-991922 - Comments

Dear Ms. Washburn:

The Washington Independent Telephone Association ("WITA") welcomes the opportunity to comment on the draft rules related to Registration, Competitive Classification, and Price Lists of Telecommunications Companies, Chapter 480-121 WAC, etc.

First, WITA very much appreciates the fact that Staff has taken into account earlier comments submitted by WITA, in particular the clarification in draft WAC 480-120-052(1)(a).

WITA offers two additional comments. These comments are consistent with the comments recently submitted by WITA concerning similar provisions in the proposed revisions to Chapter 480-120 WAC. The first is related to WAC 480-121-X02 Electronic Filing. It is WITA's position that the procedures for electronic filing should be contained in the rule itself, at least the basic requirements. It would not be appropriate to establish a set of procedures outside of the rule, then modify those procedures on an ad hoc basis and reject an electronic tariff filing for not complying with new procedures that have been adopted, but not incorporated in rule.

WITA's other comment relates to WAC 480-121-X03 Price List Availability to Customers. This proposed regulation would require that each company establish and maintain a copy of its price list on a web site accessible to the public. Some of WITA's members have long distance company affiliates. These affiliates were created at a time when Qwest Communications was exiting the intraLATA toll market. These affiliates do not offer service in broad serving areas, but rather focus their efforts on the area served by the WITA member. Some of the smaller of these WITA members and their long distance affiliates do not maintain web sites. Since the price lists are readily available to customers who come into the business office, WITA suggests that this proposed rule apply only to those companies that are serving broader areas. To accomplish this end, WITA suggests that the first subsection of the rule be written to read as follows:

WAC 480-121-X03

(1) Each telecommunications company must establish and maintain a complete copy of the price list that is on file with the commission either in its business office, if the utility serves a small geographic area with a business office reasonably accessible to the public it serves, or on a web site accessible to the public using standard web browser software.

Pursuant to your request, these comments are being submitted on an IBM formatted high density disk in .pdf Adobe Acrobat format and in Word 97.

Thank you for the opportunity to comment.

Sincerely,

TERRENCE STAPLETON

TS/ej

cc: Member Companies
Richard Finnigan
Rob Snyder