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Public Policy

September 9, 2004

Ms. Carole Washburn,
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Attention: Sharyn Bates
RE: Docket UT-040015, Corrections and Change in Rules in Chapter 480-120
WAC, Chapter 480-80 WAC, and Chapter 480-122 WAC, Relating to
Telecommunications

Dear Ms. Washburn:

Qwest Corporation ("Qwest") provides the following comments on the CR-102 proposed rule making changes in Docket UT-040015, in response to the Commission August 19, 2004 Opportunity to File Written Comments pertaining to Chapter 480-120 WAC, Chapter 480-80 WAC and Chapter 480-122 WAC, Relating to Telecommunications.

WAC 480-120-172 (7), Disconnecting Service.

Commission Staff's August 19, 2004 draft reflects the following proposed change:

(7) Discontinuation notice requirements. The company must provide the customer notice before discontinuing service in accordance with (a) through (c) of this subsection, except as provided in subsection (1) of this section, and except as provided in WAC 480-120-122(5).

As discussed with Commission staff, Qwest seeks a modification to the proposed changes to WAC 480-120-172 (7) to correct what it believes to be a typo. Specifically, one of the customer notice exceptions listed in the draft language refers to WAC 480-120-122(5). Qwest believes that this reference should be corrected to WAC 480-120-122(8) as the intent of the new language was to respond to Qwest's concerns that the draft rule would adversely affect its ability to toll restrict a customer in conjunction with WAC 480-120-122(8). Consequently, Qwest requests that reference be changed from WAC 480-120-122(5) to WAC 480-120-122(8).

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WAC 480-120-999 (5)(b), Adoption by Reference.

In the August 19, 2004 draft, the Commission's Customer Proprietary Network Information (CPNI) rule was changed to WAC 480-120-202. Consequently, the reference to the rule in WAC 480-120-999(5)(b) should be changed from WAC 480-120-207, the previous CPNI rule, to WAC 480-120-202, assuming the CPNI rule does in-fact change to that rule number.

Qwest appreciates this opportunity to provide final comment on these proposed rule changes.

Sincerely,

for Mark Reynolds