

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In regards to:) DOCKET NO. UT-030939
)
Qwest Petition for Waiver of WAC 480-120-) COMMENTS OF CITIZENS' UTILITY
104, Information to Consumers) ALLIANCE OF WASHINGTON a
) program of SPOKANE
) NEIGHBORHOOD ACTION
) PROGRAMS

The Citizens' Utility Alliance of Washington (Alliance), a project of Spokane Neighborhood Action Programs, thanks the Commission for this opportunity to comment on Qwest's petition for waiver of certain provisions of WAC 480-120-104. The Alliance has more than 2000 members from 120 Washington cities. The Alliance has reviewed the comments submitted by the Office of Public Counsel pertaining to Qwest's petition and endorses those comments. We also ask that the Commission deny Qwest's petition.

The Alliance is most concerned with the proposed temporary waiver of WAC 480-120-104(2)(b). It is our experience in helping many people, one-on-one, with their phone problems, that rate confusion is the single biggest issue facing Washington residential phone customers. Many people get confused amid the jumble of charges reflected on their phone bill; costs for basic phone service, phone feature packages, non-recurring fees, taxes, and long distance charges. They can't decipher the charges on their phone bill.

The bills also use terminology that customers are unfamiliar with and that is in a format perhaps decipherable to accountants, but not the average customer. Therefore, it is imperative that customers receive their phone rate charges in a separate format from their bill. It is also important that this occur at the outset of phone service so that errors can be identified quickly.

We think a one-year waiver of the requirement in WAC 480-120-104(2)(b) is unwarranted as Qwest has known of the new provision since at least since December 16, 2002, when the adoption order was served on Qwest. Washington phone customers should not have to wait any longer for the implementation of WAC 480-120-104(2)(b).

Dated this 8th day of July, 2003

Respectfully submitted,

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