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January 22, 2001

The Honorable Marilyn Showalter Washington Utilities and Transportation Commission 1300 S. Evergreen Park Dr. SW Olympia, Washington 98504-7250

Dear Chairwoman Showalter:

On May 30, 2000, in Docket UT-990219, the telecommunications industry was directed to submit a customer education plan for the new 564 area code overlay for Commission approval. The members of the industry submitted a plan on September 30, 2000 which was subsequently approved by the Commission on November 8, 2000. At that time, the Commission ordered the industry to report specific funding levels related to the media component of the education plan (newspaper, radio and television coverage), to detail how advertising costs will be paid for by the industry, and define how children, seniors and others will be advised of the new area code and required dialing patterns. A report to the Commission, responsive to this request, is scheduled for later this month.

Unfortunately, the industry has not come to a consensus on how the media plan costs of approximately \$1.2 million will be distributed and shared across the industry. Several meetings have been held to discuss alternatives which include dividing the \$1.2 million by the number of access lines served by each carrier in western Washington, or by the number of NXX codes assigned to each carrier. Another suggestion offered was to assess an end user surcharge. The most reasonable approach is to base the charge on the number of NXX codes held by each carrier. The number of access lines each carrier serves is a number traditionally difficult to obtain.

Several companies have volunteered to directly share in the cost of the industry's media advertising plan if all companies, or a reasonable number of companies, participate. Those companies include AT&T, Qwest, Sprint, Pac-West Telcom, Verizon and WITA on behalf of various independents companies. Other companies have either opposed the idea completely or have been non-committal. Qwest has traditionally carried the full cost of the media advertising campaign and believes others should contribute their fair share since all companies benefit from such an approach. Therefore, Qwest respectively requests that the Commission order all providers in western Washington to share in the \$1.2 million cost of the proposed media advertising plan, dividing the total cost of the plan by the number of NXX codes currently assigned to each provider.

Actual media components of the 564 Customer Education plan are set to begin very soon. Owest believes the plan approved in November, 2000 will reach and inform the greatest number of customers concerning the new area codes and dialing pattern.

Thank you for your consideration of this matter. Please call if you have any questions.

Sincerely,

Records UT 990219 UT 991535

