

August 31, 2001

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Subject: **VERIZON COMMENTS – UT-991922 - CHAPTER 480-121 WAC; WAC
480-120-052; AND WAC 480-120-058**

Pursuant to the Commission's August 13, 2001 Notice of Opportunity to File Written Comments and Notice of Workshop, Verizon Northwest Inc. and Verizon Select Services Inc. ("Verizon") provide the following comments.

Chapter 480-121 WAC

480-121-020 Requirements for applications for registration, petitions for competitive classification, and initial price lists.

For subsection (1)(b), Verizon requests that the Staff clarify whether the language is meant to mandate that every new registrant also apply for competitive classification.

480-121-040 Granting or denying petitions for registration.

Verizon suggests replacing "may grant" in subsection (1) with "will grant."

480-121-062 Requirements for filing a petition for competitive classification of a telecommunications service.

In order to streamline the competitive classification process, subsection (5)(h) should be deleted. While the "must cover cost" requirement is found in the competitive service statute (RCW 80.36.330(3)), it is not a condition of granting a petition. Rather,

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it is a requirement that applies to the service once it is classified as competitive. If the Commission has reason to believe current rates for a service are below cost, it can always send a data request.

480-121-063 Regulatory requirements that may be waived for competitively classified telecommunications companies.

In subsection (4), Verizon suggests inserting "by order" after "otherwise."

WAC 480-120-052 Prepaid calling services and WAC 480-120-058 Protection of customer prepayments

Verizon has no further comment on proposed WAC 480-120-052 and WAC 480-120-058.

Please direct any questions to Joan Gage at 425-261-5238.

Very truly yours,

Lida C. Tong
Director – Regulatory & Government Affairs