BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

Corrections and Changes in Rules in Chapter 480-120 WAC and Chapter 480-80 WAC, Relating to Telecommunications	)))	DOCKET NO. UT-040015

AT&T'S COMMENTS

Pursuant to the Washington Utilities and Transportation Commission's ("Commission's") August 19, 2004, Notice of Opportunity to File Written Comments, AT&T Communications of the Pacific Northwest, Inc, TCG Seattle and TCG Oregon (collectively "AT&T") hereby submit these Comments in the above-captioned rulemaking. AT&T appreciates the opportunity to comment on the proposed rules in this docket. In order to efficiently address the proposed rules, AT&T's comments consist of two parts. First, AT&T offers its general observations on these rules as a whole. Second, AT&T provides comments on a section-specific basis.

GENERAL OBSERVATIONS

Based on the language contained in subsection (b) of CR101[1] AT&T made a diligent effort to identify and propose language on rules that presented operational issues for the company. While AT&T recognizes that it is not reasonable to expect agreement and adoption of all of its comments, in reviewing the July 28 open meeting memo, the summary of Staff responses to comments and the draft rules proposed under the CR102,

[1] The Commission completed a comprehensive review of its rules in Chapter 480-120, Telephone Companies in 2002. The rules in Chapter 480-80 WAC took effect in June 2002. The rules in Chapter 480-120 took effect in July 2003. While implementing these rules, stakeholders and agency Staff have identified a variety of issues with the rules, including unclear provisions, incomplete cross-references, and inconsistencies with federal law, and provisions that have been struck down in court. In addition, there are provisions from the prior rules that were not an issue during the comprehensive review that have since become an issue. This rulemaking would consider possible corrections, changes, and clarifications to address the above issues and others that may emerge during the rulemaking process.

it appears that the vast majority of AT&T's comments were summarily dismissed or inadvertently overlooked. As a consequence, AT&T feels compelled to provide its concerns again in the hope that Staff will let AT&T know whether its suggestions are understood and rejected, or otherwise acceptable proposals.

In its review AT&T was also confused by the standard for adoption of changes applied in this proceeding. That is, changes proposed by stakeholders, which Staff viewed as "*substantive,*" were set aside as outside the scope of this proceeding,[2] and substantive changes proposed by Staff were moved forward into the CR102 phase of this proceeding. A concrete example is the proposed change to the WTAP rule, which eliminates the requirement that non-ETCs provide WTAP service. The change proposed was substantive and while AT&T supports the change, it was adopted by Staff under a standard of review was apparently inappropriate when applied to industry-made suggestions. Simply put, the standard for adopting changes to rules in this proceeding should be the same for all parties regardless of who is proposing the change.

COMMENTS BY RULE

I. Telco-Related Rules

AT&T's concerns with the Telecommunications rules are as follows:

A. WAC 480-120-122 Establishing Credit – Residential Service

During the CR-101, AT&T submitted comments indicating general confusion as to the intent and/or application of subsections (1), (4), (5)(a) and (6) particularly in a bundled service environment. Staff did not make any changes to the subsections to address AT&T's concerns, in fact, Staff failed to respond in any fashion to AT&T's

[2] July 28, 2004 Open Meeting Memo read, "This rulemaking will focus on minor changes included in Attachment A. Substantive rule changes may be addressed in a future rulemaking"

questions relating to proper application of these sections. The language continues to read as follows:

> (1) A local exchange company (LEC) that offers basic service as part of any bundled package of services, the requirements of this subsection apply only to its lowest-priced, flat-rated residential basic service offering. A LEC may require an applicant or customer of residential basic service to pay a local service deposit only if:
>
> (4) When a company requests a deposit from an applicant or customer, the amount of the deposit may not exceed two months' customary use for an applicant or customer with previous verifiable service of the same class, or two months' estimated use for an applicant or customer without previous verifiable service. Customary use is calculated using charges for the previous three months' service.
>
> (5) When an applicant or customer is required to pay a basic service deposit or an interexchange deposit, but is unable to pay the entire amount in advance of connection or continuation of service, ~~following will apply~~ the applicant or customer:
>
> (a) ~~The customer may~~ May pay fifty percent of the requested deposit amount before installation or continuation of service, with the remaining amount payable in equal amounts over the following two months; …
>
> (6) A company may require an applicant or customer to pay a deposit equal to two months' charges for ancillary service before providing or continuing ancillary services.

AT&T once again asks for the clarification on the intent of this section. It appears that Staff is attempting to attribute a portion of the bundled offer to basic local service, ancillary services and interexchange services. What is not entirely clear is precisely how this attribution operates, is the intent that a company disaggregate a bundled offer into its elemental costs (e.g. local, ancillary, toll) or does the language contemplate that a LEC look to its stand-alone services to determine the amount of each element? Either of these applications poses problems for competitive companies such as AT&T. First, it is often times very difficult for competitive carriers to disaggregate a bundled offer into its

elemental costs since competitive companies do not, as a general rule perform cost studies like incumbent carriers. Second, if the rule contemplates the use of stand alone services to determine deposit amounts the rule language simply fails to recognize that the future of wire line competition is bundled offers, not stand alone services. In fact, the only reason AT&T currently has a stand alone basic service offer is because of its current obligation to offer WTAP service. Should non-ETC companies be excluded from offering WTAP service as proposed, it's likely AT&T and others will eliminate their stand alone offers and move totally to bundled offers. In its prior comments AT&T asked the Commission to clarify its intent with respect to bundled offers and deposits, and suggested if the deposit limitation applies to bundles, the Commission should allow carriers that do not offer basic, ancillary and interexchange services outside bundled offers to adopt a reasonable surrogate for each element upon which to base deposit requirements. That surrogate could be identified in either tariffs or price lists as the amount upon which residential deposit requirements are based. Another possible alternative would be for the Commission to modify the language so that it is clear when a bundle includes local service that the entire monthly service amount would be considered "local service" for purposes of determining a deposit amount. In other words, no allocation to interexchange or ancillary services would be required. AT&T once again requests that the Commission consider its comments and modify the language in this subsection so that its intent is clear.

Another issue that AT&T raised in its previous comments was the fact that the existing staggered payment amounts in subsection (5) that allow consumers to pay 50 % of a deposit to initiate or continue service with 25% payable over the

next two months is a payment arrangement unique to Washington (e.g. other jurisdictions allow full payment and/or equal payment amounts) and therefore creates a costly administrative burden for carriers entering into the residential market.

AT&T was not offering residential service at the time of the previous rulemaking so it was not until recently, that the company determined that it's billing systems were unable to accommodate installment payments with amounts that vary month to month. Because AT&T determined that it would be economically infeasible to implement the system changes required to accommodate Washington's unique deposit requirements and because companies cannot deny service to known risk accounts AT&T is presently providing service to risk customers without the protection of security deposits. It is AT&T's belief that the Commission's deposit rule is intended to strike a balance between consumer needs (e.g. assuring that consumers can afford to have service connected) and protecting companies from unreasonable uncollectibles from known risk customers. It is based on these assumptions that during the previous round of comments AT&T proposed the addition of a payment plan that would spread a deposit amount into equal payments the norm in most states. Specifically, AT&T proposed that a company be allowed to collect a deposit in three equal payments. Under AT&T's proposal, consumers would actually be asked to pay a smaller initial payment to connect or continue service than under current rule (e.g. 33% rather than 50%) and a slightly higher amount over the next two months (33% rather than 25%). AT&T did not see where its proposal harmed

customers in anyway, in fact for many this option could be more desirable since it would reduce a customers initial costs when establishing a new household. Further, this proposal is beneficial because equal installment payments is the norm around the country so implementation of system changes unique to Washington are not necessary for a company to protect itself from risk. Because of this, AT&T was quite surprised that Staff summarily dismissed this option without explanation, only stating that a company could petition for a rule waiver. AT&T sees no downside to its proposal because it benefits both consumers and companies. Further, it is AT&T's belief that its proposal met the terms of the CR-101 because it addressed an issue that came to light after the "comprehensive rulemaking" was concluded.

While AT&T would only benefit from its proposed change for a short period of time, given its plans to exit the residential market, it continues to believe that its proposal makes sense from a public policy standpoint since the proposal would continue to allow consumers to pay a deposit in three payments, albeit with a smaller initial payment while allowing companies to protect themselves from "known risk customers" without having to spend resources to modify their systems for a payment plan unique to Washington. Therefore, AT&T again asks the Commission to adopt the following proposed language which provides two payment options thereby allowing carriers to select the deposit payment option which best suits their service individual offerings and billing systems.

> (5) When an applicant or customer is required to pay a basic service deposit or an interexchange deposit, but is unable to pay the entire amount in advance of connection or continuation of service, <u>the carrier must offer</u>

the applicant or customer one of the following options at the carrier's discretion:

(a) Payment of fifty percent of the requested deposit amount before installation or continuation of service, with the remaining amount payable in equal amounts over the following two months; or

(b) Payment of one-third of the requested deposit amount before installation or continuation of service, with the remaining amount payable in equal amounts over the following two months; or

(c) Where technology permits, the customer or applicant may have the option of accepting toll restricted basic service in lieu of payment of the deposit. A company must not charge for toll restriction when it is used as an alternative to a deposit.

These proposed selections would allow carriers to "fit" the deposit payments most suited to the services and systems employed by the carrier while still meeting the customer's need for extended payments.

B. WAC 480-120-147 Changes in Local and Intrastate Toll Service

In its previous comments, AT&T asked that subsection (1) and (4) be modified for consistency with FCC rules. Specifically, Subsection (1) currently states in pertinent part:

(1) **Verification of orders.** A local exchange or intrastate toll carrier that requests on behalf of a customer that the customer's carrier be changed, and that seeks to provide retail services to the customer (submitting carrier), may not submit a change-order for local exchange or intrastate toll service until the order is confirmed in accordance with one of the procedures in (a) through (c) of this subsection:

(a) The company has obtained the customer's written or electronic authorization to submit the order (letter of agency). The letter of agency must be a separate electronic form, located on a separate screen or web page, or a separate written document (or easily separable document) containing only the authorizing language described in (a)(i) through (vi) of this subsection, having the sole purpose of authorizing a telecommunications carrier to initiate a preferred carrier change. *The letter of agency, whether written or electronic, must be signed and dated by the customer of the telephone line(s) requesting the preferred carrier change*. (Emphasis added).

AT&T suggested that the term "subscriber" as defined in FCC rule[3] be substituted for the term "customer." AT&T suggested this change not only for consistency between state and federal rules but also because the definition better addresses the reality that often times people other than the customer of record are required and authorized to make changes on an account.

In their comment summary, Staff indicated that it would not be modifying the proposed language based on AT&T's comments because Staff understands the term customer "*in this instance"* includes spouses and other persons authorized to conduct business on behalf of the account holder. It is AT&T's belief that rules should be clear on their face so that compliance requirements are perfectly clear to anyone reviewing the rule. Staff may have an "understanding" that the term "customer" allows other authorized parties to make changes, unfortunately the current definition of customer within the Commission's own rules directly conflicts with Staff's "understanding" and would preclude anyone but the customer of record from making changes on an account. The definition under WAC 480-120-021 currently reads as follows: **"Customer"** means a person to whom the company is currently providing service. For clarity, AT&T is once again asking the Commission to replace the term customer with the term subscriber and adopt the FCC's definition. As an alternative, the Commission could retain the term customer and modify its

[3] 47 CFR § 64.1100(h) The term subscriber is any one of the following: (1) The party identified in the account records of a common carrier as responsible for payment of the telephone bill; (2) Any adult person authorized by such party to change telecommunications services or to charge services to the account; or (3) Any person contractually or otherwise lawfully authorized to represent such party. [65 FR 47690, Aug. 3, 2000, as amended at 66 FR 12892, Mar. 1, 2001] [[Page 288]]

definition to make it consistent both with the FCC definition and Staff's intended application to this section of the rule. Regardless of the solution, the intent of the rule should be clear on its face so compliance can be ensured.

In reviewing Staff's response relating to subsection (4) of this rule, AT&T is again concerned that although Staff once again seems to be agreeing with the intent of the changes proposed by AT&T and others it is refusing to modify the language to make it's intention clear. Specifically, AT&T previously requested that the subsection be modified as follows:

> (4) **Implementing order changes.** An executing carrier may not verify directly with the customer the submission of a change in a customer's selection of a provider received from a submitting carrier. The executing carrier must comply promptly, without any unreasonable delay, with a requested change that is complete and received from a submitting carrier. An executing carrier is any telecommunications carrier that affects a request that a customer's carrier be changed. A telecommunications carrier must submit a preferred carrier change order on behalf of a subscriber within no more than sixty days of obtaining ~~authorization~~*. a written or electronically signed letter of agency. However, letters of agency for multi-line and/or multi-location business customers that have entered into negotiated agreements with carriers to add presubscribed lines to their business locations during the course of a term agreement shall be valid for the period specified in the term agreement.*

AT&T's proposed language is consistent with a March 17, 2003 FCC decision in which the FCC ordered that it would no longer limit the effectiveness of multi-line or multi-location requests to 60-days. The FCC agreed with AT&T, as should this Commission, that large business customers typically execute letters of authorization ("LOAs") pre-subscribing all their existing lines, as well as those to be added in the

future to the selected carrier.[4] Further, the FCC understood that many large business customers seek additional lines under an installation plan that may cover many months and even up to a year beyond the date of the LOA execution. Thus, the FCC ordered that a limitation would needlessly invalidate the LOAs and would not confer additional consumer protection upon the businesses.

In their response, Staff acknowledged both AT&T and Verizon comments and stated that they understand the full term of contracts and term agreements should be honored. Given this statement AT&T is puzzled as to why Staff is refusing to modify the rule language to clarify that the 60-day period does not apply in cases where there is a term agreement. Again, this is an instance where a rule on its face is inconsistent with Staff's interpretation and therefore appears to be inconsistent with the Commission's goal in this rulemaking. AT&T therefore respectfully requests that the Commission adopt AT&T's proposed language in subsection (4).

C. WAC 480-120-164 Pro Rata Credits

Prior to this rule going into effect, a number of companies, including AT&T, contacted Staff indicating that they were unable to comply with this rule because they did not have equipment to automatically detect and measure outages. At that time, Staff provided informal advice indicating that the rule did not require automatic detection rather the rule addressed outages either reported by customers or detected by the carrier through its normal course of business. Given Staff's interpretation and the purpose stated in the CR101 of this "tune-up" rulemaking, AT&T is concerned that Staff has still not

[4] *In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; Policies and Rules Concerning Unauthorized Changes of Consumers' Long Distance Carriers,* Third Order on Reconsideration and Second Further Notice of Proposes Rulemaking, CC Docket No. 94-129, FCC 03-42 (Rel. Mar 17, 2003).

taken this opportunity to modify the language so that its interpretation and intent is clear. AT&T continues to believe that a literal reading of the existing rule requires automatic detection, and for carries without the benefit of "Staff's informal interpretation" or knowledge of the discussions that have taken place during this proceeding, this rule is going to be misinterpreted in the future. AT&T therefore requests, for the sake of clarity, that the rule be modified to read as follows:

> **WAC 480-120-164 Pro rata credits.** Every telecommunications company must provide pro rata credits to customers of a service whenever that service is billed on a monthly basis and is not available for more than a total of twenty-four hours in a billing cycle. This section applies to customer reported outages or those identified by the company in its normal course of business. The minimum amount of pro rata credit a company must provide is the monthly cost of service divided by thirty, then multiplied by the number of days or portions of days during which service was not provided.
>
> For example:
>
> (Cost of Service)
>
> X (Number of days or portions of days without service)
> = Pro Rata Credit
>
> (Thirty)
>
> Pro rata credits are not required when force majeure, customer premises equipment, or inside wiring is the proximate cause for the unavailability of a service. If a company provides a credit amount for unavailable service that is equal to or greater than the credit amount required by this rule, the amount of credit required by this rule need not be provided.

D. WAC 480-120-166 Commission-Referred Complaints

AT&T appreciates and supports Staff's proposed modification that changes the retention period from three years to two years. This change makes the rule consistent with FCC requirements.

E. WAC 480-120-172 Discontinuing Service – Company Initiated

Identity theft is a crime that is rapidly growing in this country. It is a crime, which once detected must be acted on quickly to reduce the amount of harm caused by such theft. In its prior comments, AT&T proposed language that would allow a company to immediately disconnect an account when identity theft has been detected. In its response to comments, Staff stated, "In the case of identity theft, a company can provide notice, disconnect, and rely on the restoral of service rule or establishment of credit rule to determine whether to restore service." AT&T believes Staff's position is unreasonable. People who commit identity theft do so solely to gain goods and services for which they have no intention to pay. Telecommunications services, particularly toll services when abused can accrue at astronomical levels very quickly. So to require full disconnection procedures including disconnection notices in the case of identity theft serves no purpose other than to help facilitate the crime and subject companies to increased uncollectible risk. Therefore, AT&T once again requests that the Commission modify its disconnect rule to clarify that service may be immediately disconnected when identity theft is detected.

F. WAC 480-120-174 Payment Arrangements

If the Commission accepts AT&T's proposals for modification of WAC 480-120-122 allowing deposits to be paid in two or three equal payments, then subsection (1) of this rule would also need to be modified as follows:

> (1) Applicants or customers, excluding telecommunications companies as defined in RCW 80.04.010, are entitled to, and a company must allow, an initial use, and then, once every five years dating from the customer's most recent use of the option, an option to pay a prior obligation over not less than a six-month period. The company must restore service upon payment of the first installment if an applicant is entitled to the payment

arrangement provided for in this section and, if applicable, the first ~~half~~ installment of a deposit is paid as provided for in WAC 480-120-122 (Establishing credit—Residential services).

G. WAC 480-120-439 Service Quality Performance Reports

In its response to comments, Staff makes the following statements. The present rule was adopted in 2002 after extensive comment and deliberation and that there are no new arguments presented in the current stakeholder comments. Further, company claims about operating practices and network design are overstated and any difference in practices and architecture can be handled through the alternative reporting process. AT&T respectfully disagrees with Staff's sweeping statement that the industry has overstated the differences in operating practices and network design. It is only recently that competitive companies have reached the 2% threshold and are being required to report under this rule. The Commissions current rule relies on legacy network configurations that do not match up to competitive companies networks; for example, throughout the rule reports are requested at a central office level. In reviewing the Commission's regulated utilities list there are approximately 176 registered local exchange companies – of these approximately 22 are "incumbent" local exchange companies whose networks fit into the present rule structure. It is important to note that the vast majority of ILECs are small enough that they fall well below the 2% threshold, presently set at 78,678 access lines. Therefore is it very unlikely these companies will have to report under the Commission rule anytime soon, if ever. The remaining 150 registered companies are CLECs, who if required to report as a Class A company would likely be unable to comply with the rule in its

present form required them to expend time and resources to develop an alternative reporting process.

AT&T understands from recent discussions that the Commission views consumer information as being one of the primary purposes for requiring the service quality reports. In other words as competition develops the Commission wants to be able to post company-specific service quality reports on a website so that consumer's can make informed telecommunications choices. It is AT&T's belief that the current rule runs afoul of this goal. The Commission needs to recognize that it is CLECs, not ILECs who will increasingly be required to report under this rule. Because CLEC infrastructures do not comport with ILEC infrastructure, the standard used in Commission rule, these companies will likely be filing under an alternative method unique to their configuration. Therefore, retention of existing standards will only serve to defeat the stated public policy goal since the Commission will have a difficult, if not impossible time providing consumers an apples to apples comparison since *alternative reports* will be the "norm" rather than the "exception." It is AT&T's belief that the Commission's goals would be better served if it the Commission adopted a statewide reporting standard. This standard would eliminate the variance in infrastructure, thereby eliminating the need for alternative reports saving both industry and Staff time and unnecessary expense. Use of statewide data would also allow the Commission to give consumers meaningful company comparison.

AT&T recognizes that any meaningful change to the reporting standards will require additional discussion and would be considered a substantive change and therefore falls outside the scope of this proceeding. That said AT&T believes that additional

discussions on this issue are warranted. From a public policy standpoint it makes absolutely no sense to continue to promote a standard that an entire industry segment, namely CLECS, are unable to comply with. This is particularly true when you consider, that it is CLECs, not ILECs that will be increasingly required to comply with the standards. AT&T believes the Commission could gain useful information from CLECs who have either filed or are in the process of developing alternative reports. Therefore, AT&T respectfully requests that the Commission open another proceeding to discuss whether there is a continued need for service quality reports with the proliferation of competition, if so, development of standards which will result in uniformed reporting across all industry segments required to comply with the rule. In other words, standards which do not routinely require waivers or alternative reporting methods.

H. WAC 480-120-540 Terminating Access Charges

Again, it was AT&T's understanding that the purpose of both UT-990146 and this rulemaking was to ensure that Commission policy decisions were codified in rule. On September 7, 1999 under Docket UT-990307, the Commission granted a number of competitive companies a waiver to this rule allowing them to price their access rates at an amount that is consistent with what Qwest and Verizon charge, including the universal service rate element. Because the exemption is necessary and fair, the Commission should incorporate it into the rule for all competitors. Doing so would put all competitive companies on a level playing field.

I. WAC 480-122-020 Washington Telephone Assistance Program Rate

AT&T concurs in Staff's changes to WAC 480-122-020 that eliminate the requirement that non-ETC companies with 100 or more residential access lines offer

WTAP service. In this proceeding, stakeholders advised that for a number of business reasons many companies have made the decision not to petition the Commission for ETC status. The companies further indicated as a result many non-ETC companies were not able to recover the full cost for provision of the WTAP service since non-ETCs unable to draw out of the federal fund. AT&T appreciates Staff's willingness to listen and understand the industry's position relating to this matter and supports the changes proposed by Staff. The proposal correctly places the burden of provisioning WTAP on the incumbent companies and those companies who have sought ETC status.

J. WAC 480-120-196 Customer Notice requirements -- Competitively classified telecommunications companies or services.

Staff ignored proposed language that was filed by AT&T during the CR101 period. AT&T is not certain if the language was overlooked or if Staff simply disagreed with the proposed language. AT&T finds this particularly puzzling because the proposed language is a "tune up" in the purest sense, it simply implements language that was inadvertently left out of Docket UT-990146, further Staff itself was the catalyst for AT&T proposing language. While working with Staff on a customer notice, it was discovered that the rule provision dealing with notice for incidental charges (*e.g.*, NSF check charge and late payment fee) was included in WAC 480-120-195 (Notice of tariff changes…) but inadvertently left out of WAC 480-120-196 (e.g. notice of pricelist changes). Staff indicated that it intended the provision be included in both sections and suggested that AT&T include it in its comments in the "tune-up" rulemaking.

AT&T can see no reason why Staff would now oppose the language being included in WAC 480-120-196 since it simply gives competitive companies the same flexibility that it gives noncompetitive companies. From a policy standpoint, competitive

companies had less stringent notice requirements than noncompetitive companies so it makes absolutely no sense to hold them to a more stringent standard under these circumstances. Therefore, AT&T is once again requesting that the Commission modify WAC 480-120-196 (1) to read as follows:

> (1) A company must provide customer notice before the effective date of changes to the price list for competitively classified companies or competitively classified services.
>
> (a) The company must provide notice to each affected customer at least ten days before the effective date when a company proposes to:
>
> (i) Increase rates;
> (ii) Decrease rates; or
> (iii) Change terms or conditions.
>
> The company must measure the ten-day period from the time the notice is mailed to all customers or appears in the newspaper or on the website.
>
> (b) A company that files a price list change to increase any charge that a customer may incur without being quoted a rate or price (e.g., late payment fees, insufficient fund charges, or a one-time charge) must provide notice to each affected customer on or with the first bill after the change becomes effective.
> (c) ~~(b)~~ Each customer notice must include, at a minimum: …

II. Customer Privacy Rules

In general, AT&T supports the modifications made to the privacy rules.

SUMMARY

AT&T understood the primary goals of Docket UT-990146 (i.e. the catalyst for the rules which are currently being tuned up) was to ensure Commission policy was reflected in rule and that the rules were clearly written to ensure compliance. There are a number of instances in this proceeding where stakeholders pointed out that the intent of an existing rule was unclear; existing rule language is inconsistent with federal rules; that an existing rule did not reflect Staff's informal interpretation; and lastly existing rule

language did not reflect past Commission policy (e.g., for example rule waivers). Therefore, AT&T requests that the changes it proposes herein be adopted.

Respectfully submitted this 14th day of September 2004.

AT&T COMMUNICATIONS OF THE PACIFIC NORTHWEST, INC. AND AT&T LOCAL SERVICES ON BEHALF OF TCG SEATTLE AND TCG OREGON

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