The following comments/questions are made in response to the Notice of Proposed Rulemaking (CR-102) Docket No. UT-991563:

WAC 480-120-139(1)(a): Can the LOA be on a document that combines the required subscriber information with other subscriber information required by the carrier for billing purposes? The text states that the LOA must be a separate document containing only the authorizing language - but it then goes on to say that such language can not be combined with any promotional language - does this then imply that other language which is not promotional in nature is ok? In the interest of requiring our customers to send in only one page of documentation we would like to combine the LOA language with the credit card authorization language (we bill by credit card in most cases).

WAC 480-120-139(2) states that a carrier selling more than one type of service must obtain separate authorization for each service sold "...although the authorizations may be made within the same solicitation." It would read better if it were modified to read "...although the authorizations may be made within the same document" or "...although separate aurthorizations may be contained within a single document" - that would make the language (and refernce to the "document") consistent with the language used in subsection (5).

WAC 480-120-139(1)(b) deals with electronic submission - I assume this is in reference to email LOA's - but the part that states "such authorization must be placed from the telephone number (s) for which the preferred carrier is to be changed " doesn't make any sense - if its emailed its coming from an email address not a phone number. Further it seems to state that if the LOA is via the internet then there needs to be 3rd party voice verification - again this makes no sense - an emailed LOA should be treated the same as a fax LOA. Perhaps I'm reading this wrong and this section is just in reference to telephone confirmations and not emailed documents - in which case it needs to re-written a bit so that its not confusing.