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October 9, 2013

Via E-mail and Overnight Mail

Mr. Steven King, Executive Director and Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, WA 98504-7250

Re: Docket No. UT-130701

Dear Mr. King:

Attached for filing in this docket is a list of talking points for discussion at the open meeting on October 10, 2013.

Sincerely,

FOR:

Lisa A. Anderl

LAA/jga

Enclosure(s)

Talking points in response to Staff recommendation – Docket No. UT-130701

- The Staff recommendation suggests that the payment interval is essentially a "dispute" interval, but there is no real connection between the two. If a customer disputes a charge, and the dispute is valid, CenturyLink will reverse the charge even if the bill has already been paid. As noted below, customers are informed of the terms of this option, and have alternative methods of payment to choose from, so the shorter interval should be acceptable as a part of the overall benefit/convenience to the customer of using this payment method.

- "Due date" (which is what is required by rule on the bill) is not necessarily the same as payment date. Customers can choose a payment option with a longer payment date. Under standard billing/payment practices customers can get a bill with a due date of 15 days from the date of the bill. However, in this case the customer has selected a payment option (not really a due date) that has them paying on a shorter interval. It is similar to if the customer went to their bank account and set up a recurring payment that automatically sent money on the 20th of every month.

- Consumers get the benefit of their credit card's payment interval with this option, meaning that while their card is charged after 5 days, their obligation to actually pay likely does not arise for at least another 15-45 days after the charge.

- Consumers are not unhappy with the payment interval. This issue did not arise because of any customer complaints about the payment interval. Rather, consumer affairs noticed the issue when a copy of a bill was provided in connection with a customer complaint that was unrelated to the payment interval.

- Commission rules do not require companies to accept credit cards as a form of payment.

- Consumers are well-informed about the payment interval for this type of transaction.

- Credit card payment is an option. Consumers do not have to choose to use the credit card form of payment. Consumers have the option to choose many other forms of payment, including withdrawal from a bank account, cash, checks, and money orders.

- Credit card payments are the most costly for the company to accept due to merchant fees.

- A systems change to implement a longer interval would cost upwards of $50,000 with no real customer benefit.

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