

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In Re: Rules relating to)
Commission General – Tariffs:) Docket U-991301
Chapter 480-80 WAC)
)

AT&T’S COMMENTS

AT&T Communications of the Pacific Northwest, Inc. and AT&T Local Services on behalf of TCG Seattle and TCG Oregon (“AT&T”) submit these comments pursuant to the Washington Utilities and Transportation Commission’s Notice of Opportunity to File Written Comments dated October 3, 2000.

AT&T’s comments will address the draft Price List and Contract Rules for competitively classified telecommunications companies set forth in Attachment B to the Commission’s Notice. WAC 480-80-X01 requires the filing of price lists for all types of services offered by the company, with the actual or maximum price for the service offered. This affords companies the flexibility of a maximum price for a particular service being offered, which would reduce the amount of paperwork necessary for the carriers and the Commission whenever there is a change in the price of a service. Customers will still be given actual prices and direct notice of price increases ten days before they become effective, and therefore, will not be harmed by this increased flexibility that carriers will have in preparing their price lists.

WAC 480-80-X01(3) allows the Commission to accept the price lists on a “file and use” basis, with Commission review no longer being required. This change eases the regulatory burdens upon the competitive carriers and the Commission that only serve to increase costs while failing to produce any benefit for consumers. Consumers are free to

choose among carriers and the prices and terms they offer for their services, making review by the Commission unnecessary.

AT&T has only one concern regarding proposed WAC 480-80-X02, contracts for services offered by competitively classified telecommunications companies under RCW 80.36.320. Subsection (3)(a) requires companies to submit any contract required to be filed with the Commission no later than five days after it becomes effective. The five day requirement is difficult for carriers to comply with, and should be extended to 30 days after the contract becomes effective.

AT&T appreciates the opportunity to comment on these issues and looks forward to participating further in this proceeding.

Respectfully submitted on October 23, 2000.

**AT&T COMMUNICATIONS
OF THE PACIFIC NORTHWEST, INC.
AND AT&T LOCAL SERVICES**

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