

**UT-140680 WAC Rules Review
 CR-102 Summary of Company Comments
 February 2, 2015**

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs Integra & XO	Level 3	T-Mobile	WITA	Staff
480-120-104	Information to consumers			General comment - The Joint CLECs support the proposed rules.	<p>1) Level 3 agrees with CenturyLink's first round of comments for 480-120-104 that the level of information to the customer should be deleted and let the market dictate the level of information the company discloses to the customer.</p> <p>2) Level 3 believes subsection (1)(2), (the company must inform the customer or direct the customer to the company's website for the information listed in this subsection) should remain in this rule.</p>			Staff believes all of this rule should be retained.

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs (Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-120-133	Response to time for calls to business office or repair center during regular business hours		CenturyLink proposes this rule should be eliminated. The company indicates that customers can place an order without talking to a company representative. The company offers two alternatives: (1) Deleting the rule would eliminate outdated metrics. (2) Retain the rule for calls to the repair center call where the customer does need to talk with a company representative.					Staff's review concentrated on reducing the reporting requirements for the companies. Staff still relies on the rules to ensure the companies are giving customers good service by looking at other methods to gather operating data.

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs (Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-120-172	Discontinuance of service		<p>CenturyLink proposed changes to this in subsection 8 (b), electronic notices. CenturyLink notes that the scheduled disconnect cannot be until after 5:00 pm on the second business day after the notice since the company does not disconnect service after 5:00 pm. Thus the scheduled disconnect for CenturyLink customers will not occur until the third day. CenturyLink proposes reducing the required call attempts from two to one call. CenturyLink notes that the company calls over 14,000 Washington residential customers each month.</p>					<p>CenturyLink is proposing this rule because the company does not disconnect service after 5:00 pm. The company has the ability to change their process if they believe it is necessary to disconnect the customer on the second day. Staff believes the rule should be retained.</p>

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs (Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-120-174	Payment arrangements		Subsection (1) requires the company to restore service on an unpaid account if the customers agrees to a six-month payment plan. The company asserts that monitoring these plans is manual and labor intensive and ultimately adds additional months of free service before the company disconnects the customer. The company indicates this rule does not exist in any other state and proposes to delete subsection (1) of this rule.					Staff believes this rule should not be changed. This rule allows for a partial payment once every five years. Thus customers cannot continually use this rule to avoid keeping current on its bill.
480-120-258	Collocation				Level 3 agrees that the collocation rule be retained.			Staff agrees.
480-120-438	Trouble report standard		CenturyLink proposes to eliminate this rule because of the changes in various other service quality metrics and reports.					Staff recommends the rule should be retained to establish the quality of service standard for auditing purposes.

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480-120-439	Service quality performance reports	AT&T recommends that the rule be modified to delete references to delete references to WAC 480-120-105, company performance standards and 480-120-112. The company also recommends to 480-120-439 (2) to change "Notwithstanding subsections (1) and (2)..." to "Notwithstanding subsection- (1)."			Level 3 recommends that the "3 year records retention" be changed. The company notes that it must keep all records during the three year period. The company asserts that would be burdensome and proposes that the language should be changed to "all records that the company <u>reasonably determines</u> would <u>be</u> relevant, in the case of a complaint or investigation," (underlined proposed by Level 3.)			<p>AT&T - proposed changes are acceptable with Staff.</p> <p>Level 3 - proposed changes should not be accepted by the commission. Staff has reduced the reporting requirements of the ILECs and CLECs. Neither the company nor Staff are able to accurately forecast future issues relating to service quality and Staff is reluctant to have the carriers decide what information may be relevant for a future complaint.</p>

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs (Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-120-445	Damage reporting requirements		CenturyLink states it is already complying with the requirements of RCW 19.122. CenturyLink recommends removing the notification requirements in subsection (2) from the facility operators, and suggests that the process of notifying an excavator who damages their facilities may be more suited as a function of Commission staff.					Staff does not agree with the company's proposal and believes the responsibility of notifying the excavator in subsection (2) should remain with the facilities operator. The ILECs and CLECs have alarms on their networks to advise their employees when their system is down. The facility operator dispatches technicians to repair their facilities and will probably be on site while the excavator is still at the site. Staff also believes notification by the facility operators about the requirements set forth in RCW 19.122, including RCW 19.122.053 and information concerning the Safety Committee, may help to prevent multiple damage incidents by the same excavator.

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-123-030	Contents of petition for eligible telecommunications carriers	AT&T supports the language in subsection 480-123-030 (g) defining back up power requirements.				T-Mobile supports the change to subsection (g) for backup power.		Staff agrees.
480-123-060	Annual certification of eligible telecommunications carriers					T-Mobile supports changing the due date of the report from July 31st to July 1st.		Staff agrees.

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs (Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-123-070	Annual certification and reports	Subsection 070(1)(a) requires the company to file gross capital expenditures and maintenance expense. AT&T states the language is too broad and the commission does not have the authority to review financial data that is not related to the company's ETC projects. The company suggests that the language be limited to "capital expenditures and operating expense made with federal high-cost support received by the ETC."	CenturyLink proposes that the rules for WAC 480-123-060, -070 and -080 should be modified to require only information from FCC Form 481 along with an officer affidavit attesting to the proper use of the funds.			T-Mobile believes that the FCC Form 481 will provide all of the information the commission needs and intends reference the 481 in its annual certification filing.	WITA expresses a concern that the WITA members do not have "budgeted" data at the time of the filing. WITA recommends that the language is changed to removing the word "budgeted" with the following "... the company's planned expenditures..."	1) AT&T - Staff agrees with the change suggested by AT&T. 2) CenturyLink & T-Mobile - Staff believes that the FCC Form 481 will provide most of the information but not all of the information needed by Staff. Staff will request any additional information it needs after Staff has reviewed each company's filing. 3) WITA - Staff agrees with WITA's recommendation to change "budgeted" to "planned".

WAC	WAC Title	AT&T	CenturyLink	Joint CLECs (Integra & XO)	Level 3	T-Mobile	WITA	Staff
480-123-080	Annual plan for universal service	AT&T also recommends the proposed changes to 480-123-070 be inserted in this rule.						Staff agrees with the change suggested by AT&T