



THE WESTIN HOTEL
Seattle

Douglas Hales
Managing Director

December 6, 1990

Washington Utilities and
Transportation Commission
Attn: Sharon L. Nelson, Chairman
1300 S. Evergreen Park Dr. S.W.
Olympia, WA 98504

RE: WUTC Docket No.: UT 900726

Dear Ms. Nelson:

I am writing to you on behalf of The Westin Hotel, Seattle, to express our strong opposition to the proposed limit of charges for local and toll free calls to \$.25 and the elimination of the access charge for 800 or zero plus calls.

I wish to express to you our strong opposition to any attempt to legislate the ceiling on what hotel operators can charge for local and toll free calls. For years, it has been our desire to offset the high cost of maintaining a hotel phone switch by charging guests for usage as opposed to offsetting these costs through higher room rates. In addition to the monthly lease payment associated with a 1.5 million dollar telephone switch, it is also encumbent upon us to staff our telephone department on a 24 hour basis, 365 days a year, with peak staffing levels often reaching 6 and 7 telephone operators. Aside from the philosophical question of whether it should be left to market forces to regulate such pricing, our hotel is doing little more than simply covering the astronomical expense of maintaining a hotel phone switch to provide the service level expected by today's traveler.

Our guests are now asking, or rather telling us, that in today's day and age they expect us to have two phone lines in our guest rooms, a hold button, facsimile and modem capability. Our plans to upgrade our current phone system to adapt to the changing marketplace will be derailed if such legislation is allowed to commence.

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CHAIRMAN WUTC

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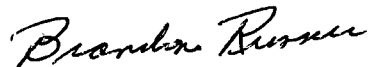
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The Westin Hotel, Seattle, and Westin Hotels and Resorts, have long been proponents of posting phone service information beside guest room telephones and choosing every opportunity to advise our customers of the cost associated with phone usage. We were one of the first companies to question the ethical nature of an alternate operator service and have a company policy forbidding their use.

A decision to restrict the charges for local and toll free calls to \$.25 will merely shift the burden of our telephone operating costs from those who are actually using the service to all of our guests.

Thank you for your attention.

Sincerely,



Brandon Russell
Executive Assistant Manager

BR:bl

cc: Doug Hales

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