

STAFF INVESTIGATION

WTI, LLC

Docket UT-080455

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December 2008**

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PURPOSE, SCOPE, AND AUTHORITY

Purpose

The purpose of Docket UT-080455 is an investigation into WTI, LLC's (WTI) cessation of dial-tone service by the staff of the Washington Utilities and Transportation Commission (commission).

Scope

The scope of the investigation focuses on whether WTI provided proper notice to its customers and the commission when the company discontinued dial-tone service and whether WTI responded to commission-referred complaints in accordance with the rules.

Authority

Staff undertakes this investigation under the authority of the Revised Code of Washington (RCW) 80.01.040, which directs the commission to regulate telecommunications companies in the public interest, and to adopt such rules and regulations as may be necessary to do so. The commission has adopted such rules in Washington Administrative Code (WAC) 480-120-083, which sets requirements for companies that cease the provision of any telecommunications service in all or any portion of the state and WAC 480-120-166, which sets requirements for companies responding to customer complaints. In addition, RCW 80.04.070 makes it clear that the commission is authorized to conduct such an investigation and RCW 80.04.380 provides for penalties for violations by public service companies and officers, agents, and employees thereof.¹

¹ See referenced laws and rules at Appendix A.

EXECUTIVE SUMMARY

The commission's Compliance Investigations staff investigated WTI's actions as it pertains to its cessation of dial-tone service to its customers.

Based on the information obtained in this investigation, staff finds that WTI, LLC, violated WAC 480-120-083 by failing to provide the commission notice under WAC 480-120-083 when it ceased providing dial-tone service in the state of Washington. In addition, staff finds that WTI violated WAC 480-120-166(6) in 53 instances by failing to respond to commission-referred service-affecting complaints timely.

Staff recommends the commission issue a \$73,000 penalty to WTI, LLC, as provided under RCW 80.04.380, \$53,000 for 53 violations of WAC 480-120-166(6) and \$20,000 for 20 violations of various provisions of WAC 480-120-083, 18 recorded in individual consumer complaints and an additional two recorded in this investigation for failure to provide proper notice to the commission when it ceased providing service in both Qwest and Verizon's service territory.

Total recommended penalties: \$73,000

BACKGROUND

Company Information

This investigation was prompted by WTI's cessation of dial-tone service to some of its Washington customers in February 2008. WTI is a competitively classified telecommunications carrier authorized to provide local and long distance services, as well as debit and data services, in the state of Washington. The company's registration does not authorize it to provide operator services or payphone services.

WTI petitioned the commission for registration as a competitive telecommunications company on July 22, 2005. The petition was filed in the name of WTI, LLC, doing business as Marathon Communications. The company's mailing address is 22722 29th Drive Southeast, #120, Bothell, Washington, 98021. Gary Keister, Robert Manning and Bob Baur were listed in the spaces provided on the registration application for the officers or directors of the company. All three had a title of "Manager²." The registration was granted by the commission on August 19, 2005, under Docket UT-051136.

On September 30, 2005, in Docket UT-051486, WTI requested removal of its trade name, Marathon Communications, citing the confusion of having multiple trade names and only one showing on its registration certificate from the commission. The removal of the trade name was allowed to become effective on October 12, 2005.

On May 3, 2007, WTI filed its 2006 annual report. It reported \$499,536 in intrastate revenue and paid \$949.07 in regulatory fees. However, on page two of the 2006 annual report, WTI stated it provided operator services at a call aggregator location (such as at a pay phone) and that it did not provide local exchange services in Washington. A review of WTI's 2005 annual report received on May 3, 2006, reflected the same, the company stated it provided operator services at a call aggregator location and did not provide local exchange services in Washington.

WTI's Web site (www.wtillc.com) indicates the company "offers a full suite of telecommunications products and services, including: local voice, long distance, high-speed internet, VoIP, calling cards, toll-free, and T1 services."

Prior Enforcement Activity

On May 4, 2007, the commission penalized WTI \$7,600 for 76 violations of WAC 480-120-166. Despite receiving technical assistance from Consumer Protection staff on numerous occasions between December 2006 and April 2007, WTI failed to respond in accordance with the rules in five consumer complaints. WTI requested mitigation of the penalty, from \$7,600 to \$3,800. WTI argued that it did not attend to correspondence from the commission because it faced a difficult business situation in the preceding weeks. The commission received WTI's request for mitigation 12 days after the statutory deadline for such petitions had expired. On June 26, 2007, the commission denied mitigation based upon the untimely filing of the petition and WTI was ordered to pay the \$7,600 penalty immediately. The commission received WTI's payment in full on July 2, 2007.

² Copy of registration application at Appendix B.

WTI Affiliate

In April 2006, the commission issued a \$16,300 penalty assessment for violations of WAC 480-120-166 to Marathon Communications, Inc. (Marathon), a then-registered telecommunications provider. Marathon did not pay the penalty assessment and in September 2006 notified the commission it had transferred all of its customers to another telecommunications provider, closed its bank accounts and shut down its business in April 2006. Marathon stated it followed the proper notification process, however, the commission did not receive prior notification of the cessation of services in accordance with WAC 480-120-083. The \$16,300 penalty assessment was written off by the commission as uncollectable in January 2007.

Upon further investigation of Marathon in September 2006, it was discovered that another registered telecommunications company, WTI, had the exact same address and telephone numbers as Marathon. In addition, company contacts for Marathon were the same contacts as for WTI. Consumer complaints for Marathon were passed to Lisa Rucks at lrucks@marathon.net. After Marathon notified the commission that it had ceased operating, consumer complaints for WTI were passed to Ms. Rucks at lrucks@wtillc.com. There were no consumer complaints filed against WTI prior to December 2006.

Electronic communications regarding staff's investigation of Marathon and the subsequent \$16,300 penalty assessment, between Ms. Rucks and Compliance Investigations' staff were often copied by Ms. Rucks to Andy Wilson and Robert Manning, both at an e-mail address of "...@wtillc.com." Robert Manning is listed as WTI, LLC's CEO on its 2005 and 2006 annual reports.

Based upon the information presented above, staff believed that Marathon customers were transferred to WTI and that Marathon and WTI were affiliated. Further, staff believes it is likely that Marathon has continued to provide telecommunications services in Washington state.

On April 10, 2008, a Washington consumer filed a complaint against World Communications, Inc. (WCI) (a company unrelated to this investigation). The consumer alleged that WCI slammed his local long distance and long distance services away from his preferred provider, Marathon. The consumer provided the commission with a copy of his September 10, 2007, Verizon bill statement which demonstrated long distance services being switched from WCI back to Marathon on August 29, 2007, more than a year after Marathon claimed it ceased providing telecommunications services in Washington³.

³ See a copy of the consumer September 10, 2007, bill statement at Appendix C.

INVESTIGATION

Consumer Complaints

The commission's Consumer Protection office was contacted on January 10, 2008, by a WTI customer stating he received an automated call on January 9, 2008, which informed him WTI would no longer provide dial-tone in one week's time (consumer complaint 102458). The customer received confirmation of that information on January 10, 2008, when he spoke directly with a WTI representative. The customer told Consumer Protection staff that he received no notice prior to the automated phone call regarding the cessation of service.

Consumer Protection staff Nancy Paulson passed consumer complaint 102458 to WTI complaint contact Susan Hunich on January 10, 2008. Marcos Melendez of WTI responded to Ms. Paulson that same day, stating he was looking into the situation and would get back to her with the supporting documentation. In accordance with WAC 480-120-166(6), WTI's response to the service-affecting complaint was due by close of business on January 14, 2008.

On January 15, 2008, having received no further information from Mr. Melendez, Ms. Paulson sent another e-mail to Mr. Melendez requesting an update on his investigation of the complaint and notifying him she would be recording daily violations until his response was received. On January 16, 2008, Mr. Melendez responded, stating he would have some documentation sent to her. Ms. Paulson did not receive the promised information.

On January 22, 2008, Susan Hunich provided Ms. Paulson with the notice that was sent to WTI customers⁴. The notice is dated the same day the consumer filed his complaint, January 10, 2008. The notice states WTI will cease offering local dial-tone service to its customers as of February 10, 2008. Staff recorded two violations of WAC 480-120-166(6) in complaint 102458.

Six more complaints were filed against WTI in February 2008. In all six complaints, the customers' dial-tone service was disconnected. All six customers alleged they received no prior notice of the discontinuance of service. In those six complaints, WTI failed to provide its initial response to the service-affecting complaints in accordance with WAC 480-120-166(6)⁵.

In March 2008, the commission received two more complaints, only one of which WTI responded to timely. That complaint (complaint 100307 filed on March 6, 2008), although service-affecting, regarded WTI's long distance service and not its discontinued dial-tone service. WTI's initial response was due by 5:00 pm on March 10, 2008. The response was received the day after the complaint was filed, on March 7, 2008. No violations were recorded.

The second service-affecting complaint filed in March against WTI (complaint 103037) was received on March 11, 2008, and regarded WTI's dial-tone service. The customer alleged their dial-tone service was disconnected without prior notice from the company. Further, the customer alleged four attempts were made to contact WTI, however, all requests to return his call were ignored. WTI again failed to respond to the service-affecting complaint in accordance with WAC 480-120-166(6). WTI's initial response was due by 5:00 pm on March 13, 2008. On March 17, 2008, Consumer Protection staff Dennis Shutler notified WTI that he was recording daily

⁴ See copy of January 10, 2008, customer notice at Appendix D.

⁵ See summary table of complaints and corresponding complaint records at Appendix E.

violations of WAC 480-120-166(6) until such time as an initial response to the complaint was received from WTI. Fred Rychard of WTI responded to the complaint on March 20, 2008. Five violations of WAC 480-120-166(6) were recorded for complaint 103037.

In summary, from January through March 2008, WTI failed to timely respond to eight commission-referred service-affecting complaints, committing a total of 53 violations of WAC 480-120-166(6).

Also, commission staff found that WTI failed to provide to customers associated with complaints filed from January through March 2008, proper notice of cessation of telephone service in compliance with commission rules. Staff found, and recorded, eight violations of WAC 480-120-083(2)(c), three violations of WAC 480-120-083(4)(c), and seven violations of WAC 480-120-083(4)(d).⁶

Staff Contact with WTI

On January 23, 2008, Sharyn Bate, a Regulatory Analyst with the commission's telecommunications section, received an e-mail inquiry from John Cupp of the commission's Consumer Protection Office. Mr. Cupp inquired if the commission had received notice regarding WTI's cessation of dial-tone service. Ms. Bate began her investigation by checking the commission's Records Management System to determine whether WTI had noticed the commission in accordance with WAC 480-120-083. Ms. Bate found no such filing on behalf of WTI. Ms. Bate then attempted to contact Bob Baur, WTI's Chief Financial Officer, however, his voice mailbox was full and she was unable to leave a message for him. Ms. Bate next attempted to contact Christopher Gillen, WTI's Project Coordinator. Although Ms. Bate left a message on Mr. Gillen's voicemail asking that he return her call, she received no return call.

On January 24, 2008, Ms. Bate sent an e-mail to Christopher Gillen advising him of the requirements of WAC 480-120-083. The e-mail was returned "undeliverable."

On January 25, 2008, Ms. Bate spoke with Nancy Paulson of the commission's Consumer Protection Office. Ms. Bate inquired how Ms. Paulson had acquired a copy of the WTI notice regarding the cessation of dial-tone service that was sent to WTI customers. Ms. Paulson received the notice during her investigation of a consumer complaint against WTI. Susan Hunich provided Ms. Paulson with the notice as part of WTI's response to the complaint. Ms. Paulson provided Ms. Bate with Ms. Hunich's name and contact information. That same day Ms. Bate left a voicemail message for Ms. Hunich. In the message Ms. Bate explained that WTI is required to notify the commission of any cessation of services. Ms. Hunich returned the call and Ms. Bate again explained the requirements of WAC 480-120-083. Ms. Bate spoke with Ms. Hunich at length stressing that WTI was not in compliance with the rule. Ms. Hunich told Ms. Bate that she would inform WTI's owner. As the affected WTI customers were in Qwest's service territory, Ms. Bate attempted to contact Mark Reynolds, regulatory contact for Qwest, leaving a voicemail message for him as well.

On January 28, 2008, Ms. Bate again left a voicemail message for Ms. Hunich. Ms. Hunich did not return that call. Ms. Bate then spoke with Mr. Reynolds of Qwest, discussing calls Qwest was receiving from WTI customers asking for a transfer of dial-tone service from WTI to Qwest.

⁶ See summary table of complaints and corresponding complaint records at Appendix E.

On January 29, 2008, Ms. Bate again attempted to reach Ms. Hunich without success. Ms. Bate also attempted to contact WTI using its customer service line. After remaining on hold for more than 15 minutes, Ms. Bate disconnected the call.

On January 30, 2008, Mr. Reynolds advised Ms. Bate that Qwest would honor the February 10, 2008, disconnection date printed on WTI's customer notice, and would then be disconnecting WTI's service. Mr. Reynolds informed Ms. Bate that WTI owed Qwest hundreds of thousands of dollars that he felt would never be recovered. He also informed Ms. Bate that 100 or so customers still remained with WTI.

On or about February 3, 2008, Mr. Reynolds informed Ms. Bate that Qwest had arranged for a toll-free number to assist in expediting WTI customers' migration to Qwest's service.

As of the date of this report, Ms. Bate has had no contact from WTI since her January 25, 2008, telephone conversation with Susan Hunich. In addition, WTI has failed to notify the commission that it ceased to provide dial-tone service in compliance with WAC 480-120-083.

On March 24, 2008, staff sent Robert Manning, WTI's CEO, an e-mail requesting information regarding the number of WTI customer's affected by its cessation of dial-tone service. In addition, staff asked for clarification of information provided on WTI's 2005 and 2006 annual reports, specifically why the annual reports indicate WTI does not provide dial-tone service yet WTI customers have been receiving dial-tone service.

On March 26, 2008, Trisha Smith, WTI Controller, responded to staff's inquiry⁷. Ms. Smith reported that, in Qwest's service territory:

- 451 WTI customers switched their dial-tone service back to Qwest.
- 68 WTI customers went with another provider of their choice.
- Eight WTI customers cancelled service, either switching to another provider or deciding to use cell phones exclusively.
- 23 WTI customers were not contacted by WTI, due to the customer either not having voicemail service or having not returned WTI's calls.
- 55 WTI customers, that WTI was unaware of, lost dial-tone service and were then assisted by WTI in getting their dial-tone service restored with Qwest.

Commission staff clarified with Ms. Smith as to the meaning of WTI being "unaware" of 55 customers. Ms. Smith stated that some of the 55 WTI customers were coded as service levels other than local resale in its billing system and so they did not turn up in a printout of the affected customers. In addition, some were on its reseller account but did not have WTI accounts, and some had left WTI and transferred their service back to Qwest but had remained on WTI's account with Qwest.

In Verizon Northwest, Inc.'s (Verizon) territory, Ms. Smith reported WTI would cease providing dial-tone service to 159 customers. That cessation was scheduled for April 15, 2008.

⁷ See copy of e-mail correspondence between commission staff and Ms. Smith at Appendix F.

Regarding information provided on WTI's 2005 and 2006 annual reports, Ms. Smith reported that it appears there may have been confusion regarding how WTI should have answered the question about providing dial-tone service. Ms. Smith stated that WTI customers billed for dial-tone service are not provided that dial-tone service off of a WTI switch, instead they are resold Qwest and Verizon dial-tone service. WTI interpreted that to mean, for the purpose of the annual report, that it did not provide dial-tone service.

Qwest Corporation

On March 4, 2008, commission staff sent an e-mail inquiry to Steve Oxnevad in the Executive Offices of Qwest Corporation (Qwest) regarding WTI. The inquiry referenced information provided by Mr. Oxnevad on January 31, 2008, to Consumer Protection staff Roger Kouchi for complaint 102616. Mr. Oxnevad provided information to Mr. Kouchi on an inquiry basis (meaning information was sought from Qwest regarding a WTI complaint as Qwest was the underlying carrier for WTI's dial-tone service). Mr. Oxnevad stated that Qwest had begun the process of formal disconnection of Marathon for non-payment. Mr. Oxnevad stated that the disconnection date had been extended to February 11, 2008, so Marathon end users would have time to arrange for a new provider.

Staff's March 4, 2008, e-mail to Mr. Oxnevad asked that he provide the complete name for "Marathon." Mr. Oxnevad stated he believed Qwest was dealing with Marathon Communications, Inc., based somewhere in the Seattle area. Mr. Oxnevad stated that Qwest regulatory staff had advised him that the non-pay disconnect date was to be February 11, 2008, however, he believed it did not physically happen until February 26, 2008. Mr. Oxnevad went on to say that Qwest regulatory staff advised him that WTI appeared to be a holding company of some sort, offering telecommunications services such as long distance, whereas Marathon is a local service provider.

Verizon Northwest Inc.

On March 14, 2008, in an e-mail sent to Suzanne Stillwell, Supervisor, Consumer Protection, and copied to Susan Hunich and Marcos Melendez of WTI, Fred Rychard of WTI provided a copy of the March 13, 2008, notice mailed to WTI customers in Verizon's territory notifying those customers of WTI's intent to cease providing dial-tone service as of April 15, 2008⁸. Mr. Rychard's e-mail to Ms. Stillwell stated he believed WTI sent out about 150 of the notices. Ms. Stillwell inquired if WTI had sent the letter to the commission in accordance with WAC 480-120-083(2)(a). Mr. Rychard responded that he would have to check and asked, since WTI was "simply reselling Verizon dial tone" which part of WAC 480-120-083 applied. Ms. Stillwell responded that WTI is operating as a telecommunications company, and therefore the rule applies to WTI since the company is ceasing services in portions of the state. Ms. Stillwell went on to say that several sections of the rule would apply to the situation.

Although WTI provided Ms. Stillwell a copy of its March 13, 2008, notice to its customers in Verizon's territory, the notice did not meet the requirements of WAC 480-120-083(3). The notice did not provide the number of customers for each telecommunications service and their location, described by exchange or by city and county for each telecommunications service ceased.

⁸ See copy of March 13, 2008, customer notice at Appendix G.

(3) The notice to the commission and the state 911 program required in subsections (2)(a) and (b) must include:

(a) The name of the exiting telecommunications company;

(b) For each category of service, the date each telecommunications service will cease; and

(c) The number of customers for each telecommunications service and their location, described by exchange or by city and county for each telecommunications service being ceased.

At the time of this report, the commission had not been contacted by any WTI customers in Verizon's service territory, nor has WTI appropriately notified the commission in accordance with WAC 480-120-083(3) that it is ceasing or has ceased to provide dial-tone services in Washington.

Violations of Commission Rules

Commission staff believes that WTI committed 53 violations of WAC 480-120-166(6) by failing to report the results of its investigation of service-affecting informal complaints to commission staff within two business days from the date commission staff passed the complaints to the company. In addition, this investigation finds that WTI violated provisions of WAC 480-120-083 by failing to properly notify customers and the commission that it was ceasing to provide telecommunication service, as follows:

- One violation of WAC 480-120-083(2)(a)
- Eight violations of WAC 480-120-083(2)(c) ⁹
- One violation of WAC 480-120-083(4)(c)
- Three violations of WAC 480-120-083(4)(c) ¹⁰
- Seven violations of WAC 480-120-083(4)(d) ¹¹

⁹ See summary table at Appendix E.

¹⁰ *Id.*

¹¹ *Id.*

CONCLUSIONS

Based on the information obtained in this investigation, staff believes that Marathon continued to operate after informing the commission in 2006 that it had ceased operating its business and after voluntarily canceling its telecommunications registration. Further, staff believes Marathon was providing dial-tone services for which WTI then billed the customer, giving the appearance that services were in fact provided by WTI. This is based upon information obtained from Qwest which stated it was disconnecting its customer Marathon for non-payment. That disconnection of service resulted in WTI's customers losing dial-tone. This belief is further backed up by WTI's 2005 and 2006 annual reports which state WTI does not provide dial-tone services in Washington, and Marathon being the preferred provider for a Washington customer's local and long distance service more than a year after Marathon told the commission it had ceased doing business in Washington.

Staff believes WTI did not give many customers written notice of cessation of service at least thirty days in advance as required by WAC 480-120-083(2)(c). In addition, staff believes that WTI did not give proper notice to its customers under WAC 480-120-083(4) as the notice did not provide information on how customers could obtain a refund on prepaid unused services. WTI did not provide the required second written notice or a telephone notice within the required time-frame. In addition, WTI did not provide proper notice to the commission that it was ceasing to provide dial-tone services to its customers in compliance with WAC 480-120-083(2)(a) and WAC 480-120-083(3). Further, staff believes WTI knowingly violated WAC 480-120-083 because commission staff spoke with WTI, provided it a copy of the rule and still WTI did not provide proper notice of the cessation of dial-tone service to the commission.

Finally, staff also believes WTI failed to respond to commission-referred service-affecting complaints regarding its dial-tone service, accruing 53 violations of WAC 480-120-166(6), fully aware it was in violation. This belief is demonstrated by WTI's willingness to respond timely to a non-dial-tone complaint in the midst of its suspected purposeful non-response to dial-tone complaints.

Recommendations

WTI, LLC is subject to penalties of up to \$1,000 for each and every violation of commission rules, as provided by RCW 80.04.380. Staff recommends the commission issue a complaint and penalize WTI, LLC, \$1,000 for each of the 53 violations of WAC 480-120-166(6). In addition, staff recommends the commission penalize WTI, LLC, \$1,000 for each of the 20 violations of WAC 480-120-083. In addition to the 18 violations recorded in the consumer complaints where WTI failed to provide its customers proper notice of disconnection of dial-tone, staff finds WTI failed to provide proper notice to the commission for cessation of service in both Qwest and Verizon territories, an additional two violations of the rule. The total recommended penalty is \$73,000.

Total recommended penalties: \$73,000

APPENDIX A

RCW 80.01.040

General powers and duties of commission.

The utilities and transportation commission shall:

(1) Exercise all the powers and perform all the duties prescribed therefor by this title and by Title [81](#) RCW, or by any other law.

(2) Regulate in the public interest, as provided by the public service laws, the rates, services, facilities, and practices of all persons engaging in the transportation by whatever means of persons or property within this state for compensation, and related activities; including, but not limited to, air transportation companies, auto transportation companies, express companies, freight and freight line companies, motor freight companies, motor transportation agents, private car companies, railway companies, sleeping car companies, steamboat companies, street railway companies, toll bridge companies, storage warehousemen, and wharfingers and warehousemen.

(3) Regulate in the public interest, as provided by the public service laws, the rates, services, facilities, and practices of all persons engaging within this state in the business of supplying any utility service or commodity to the public for compensation, and related activities; including, but not limited to, electrical companies, gas companies, irrigation companies, telecommunications companies, and water companies.

(4) Make such rules and regulations as may be necessary to carry out its other powers and duties.

[1985 c 450 § 10; 1961 c 14 § [80.01.040](#). Prior: (i) 1949 c 117 § 3; Rem. Supp. 1949 § 10964-115-3. (ii) 1945 c 267 § 5; Rem. Supp. 1945 § 10459-5. (iii) 1945 c 267 § 6; Rem. Supp. 1945 § 10459-6. Formerly RCW [43.53.050](#).]

WAC 480-120-083

Cessation of telecommunications services.

(1) This rule applies to any telecommunications company that ceases the provision of any telecommunications service in all or any portion of the state (exiting telecommunications company). This rule does not apply to:

(a) Services offered by tariff that are subject to the statutory notice requirements of RCW 80.36.110 (Tariff Changes – Statutory Notice – Exception);

(b) Discontinuance of service to an individual customer in compliance with WAC 480-120-172 (Discontinuing service -- Company initiated);

(c) Cessation of a service when the provider replaces the terminated service with comparable service without interruption. For example, the notice requirements of this rule do not apply when a local exchange carrier (LEC) providing Centrex-type service with one group of features replaces that service, without interruption, with a version of Centrex-type service that has a different group of features; and

(d) A service being discontinued that has no subscribers.

Changes in customers' service providers for local exchange and intrastate toll services when there is a cessation of service are also subject to WAC 480-120-147 (Changes in local exchange and intrastate toll services).

(2) No telecommunications company may cease the provision of any telecommunications service in all or any portion of the state unless it first provides written notice to the following persons at least 30 days in advance of cessation of service:

(a) The commission;

(b) The state 911 program, in the instance of local exchange service, private branch exchange service (PBX), Centrex-type service, or private line service used in the provision of emergency services related to the state 911 program;

(c) Each of its customers, including customers that are telecommunications companies;

(d) Incumbent local exchange carriers (ILECs) providing the exiting telecommunications company with unbundled network elements (UNEs) pursuant to the Telecommunications Act of 1996, 47 U.S.C. Section 151 *et seq.*, if UNEs or combinations of UNEs are part of a telecommunications service provided to some or all of the exiting telecommunications company's customers;

(e) Each telecommunications company providing the exiting telecommunications company with resold telecommunications service, if resold service is part of a telecommunications service provided

to some or all of the exiting telecommunications company's customers;

(f) The national number administrator authorizing the release of all assigned telephone numbers to other telecommunications companies and releasing all unassigned telephone numbers to the number administrator.

(3) The notice to the commission and the state 911 program required in subsections (2)(a) and (b) must include:

(a) The name of the exiting telecommunications company;

(b) For each category of service, the date each telecommunications service will cease; and

(c) The number of customers for each telecommunications service and their location, described by exchange or by city and county for each telecommunications service being ceased.

(4) The notice to customers required in subsection (2)(c) must include:

(a) The date telecommunications service will cease;

(b) Information on how to contact the exiting telecommunications company by telephone in order to obtain information needed to establish service with another provider;

(c) An explanation of how customers may receive a refund on any unused service. The exiting telecommunications company must provide information to consumers via its customer service number outlining the procedure for obtaining refunds and continue to provide this information for sixty days after the date of cessation of service.

(d) A second notice provided by one of the two options listed below:

(i) Between ten and thirty days before cessation of service, the exiting telecommunications company must complete one direct call advising every customer of the cessation of service, including the date of cessation of service and a number to call for more information, if necessary. A direct call means a call in which the company leaves a recorded voice message for or speaks directly to the responsible party or its agent on the billing account; or

(ii) At least ten days before cessation of service, the exiting telecommunications company must provide a second written notice of cessation of service including the date of cessation of service and a number to call for more information, if necessary;

(e) A company may seek the commission's assistance in drafting the customer notices.

(5) The notice to ILECs required in subsection (2)(d) must include:

(a) The date telecommunications service will cease;

(b) Identification of the UNE components in relationship to the service information provided to the customer when such information differs from the ILEC's identification information as billed to

the exiting telecommunications company. For example, if the ILEC identifies a UNE loop with a circuit identification number, the exiting telecommunications company must provide the ILEC with the customer telephone number assigned to the ILEC's UNE loop circuit identification number; and

(c) The telephone contact information to enable the ILEC or new provider to obtain UNE service and circuit identification information needed to establish service for a customer who will no longer receive service from the exiting telecommunications company.

(6) The notice to suppliers required in subsection (2)(e) must include:

(a) The date telecommunications service will cease;

(b) Identification of the resold service element components in relationship to the service information provided to the customer, when such information differs from the supplier's identification information as billed to the exiting telecommunications company; and

(c) Telephone contact information to enable the regulated supplier or new provider to obtain underlying service and circuit identification information needed to establish comparable replacement service for a customer who will no longer receive service from the exiting telecommunications company.

(7) The notice to the national number administrator required in subsection (2)(f) must include:

(a) Identification of all working telephone numbers assigned to customers;

(b) Identification of all unassigned or administrative numbers available for reassignment to other providers and the date such unassigned telephone numbers will be available for reassignment; and

(c) Authorization of the release of each individual assigned customer's telephone number(s) to subsequent providers selected by the customer.

(8) ILECs and telecommunications companies that are suppliers under subsection (6) must provide the information in the required notice(s) (if received) to the subsequent provider upon a request authorized by the customer.

(9) A telecommunications company ceasing a local exchange service, a PBX service, a Centrex-type service, or a private line service used in the provision of emergency services related to the state 911 program must inform the commission and the state 911 program within twenty-four hours of the cessation of telecommunications service of the number of customers and their location, listed by exchange or by city and county, that remained as customers for the telecommunications service when service ceased.

[Statutory Authority: RCW 80.01.040, 80.04.160, 81.04.160, and 34.05.353. 03-22-046 (Docket No. A-030832, General Order No. R-509), § 480-120-083, filed 10/29/03, effective 11/29/03. Statutory Authority: RCW 80.04.160 and 80.01.040. 01-24-114 (General Order No. R-494, Docket No. UT-010558), § 480-120-083, filed 12/5/01, effective 1/5/02.]

WAC 480-120-166

Commission-referred complaints.

(1) Each company must keep a record of all complaints concerning service or rates for at least two years and, on request, make them readily available for commission review. The records must contain complainant's name and address, date and the nature of the complaint, action taken, and final result.

(2) Each company must have personnel available during regular business days to respond to commission staff.

(3) Applicants, customers, or their authorized representatives, may file with the commission an informal complaint as described in WAC [480-07-910](#) (Informal complaints) or a formal complaint against a company when there are alleged violations of statutes, administrative rules, or tariffs as provided by WAC [480-07-370](#) (Pleadings -- General).

(4) When the commission staff refers an informal complaint to a company, the company must:

(a) Stop any pending action involving the issues raised in the complaint provided any amounts not in dispute are paid when due (e.g., if the complaint involves a disconnect threat or collection action, the disconnect or collection must be stopped);

(b) Thoroughly investigate all issues raised in the complaint and provide a complete report of the results of its investigation to the commission, including, if applicable, information that demonstrates that the company's action was in compliance with commission rules; and

(c) Take corrective action, if warranted, as soon as appropriate under the circumstances.

(5) Commission staff will ask the customer filing the informal complaint whether the customer wishes to speak directly to the company during the course of the complaint, and will relay the customer's preference to the company at the time staff opens the complaint.

(6) Unless another time is specified in this rule or unless commission staff specifies a later date, the company must report the results of its investigation of service-affecting informal complaints to commission staff within two business days from the date commission staff passes the complaint to the company. Service-affecting complaints include, but are not limited to, nonfunctioning or impaired services (i.e., disconnected services or those not functioning properly).

(7) Unless another time is specified in this rule or unless commission staff specifies a later date, the company must report the results of its investigation of nonservice-affecting informal complaints to commission staff within five business days from the date commission staff passes the complaint to the company. Nonservice-affecting complaints include, but are not limited to, billing disputes and rate quotes.

(8) Unless another time is specified in this rule or unless commission staff specifies a later date, the company must provide complete responses to requests from commission staff for additional information on pending informal complaints within three business days.

(9) The company must keep commission staff informed when relevant changes occur in what has been previously communicated to the commission and when there is final resolution of the informal complaint.

(10) An informal complaint opened with the company by commission staff may not be considered closed until commission staff informs the company that the complaint is closed.

[Statutory Authority: RCW [80.01.040](#) and [80.04.160](#). 05-03-031 (Docket No. UT 040015, General Order No. R-516), § 480-120-166, filed 1/10/05, effective 2/10/05; 03-24-028 (General Order R-510, Docket No. A-010648), § 480-120-166, filed 11/24/03, effective 1/1/04; 03-01-065 (Docket No. UT-990146, General Order No. R-507), § 480-120-166, filed 12/12/02, effective 7/1/03.]

RCW 80.04.070

Inspection of books, papers, and documents.

The commission and each commissioner, or any person employed by the commission, shall have the right, at any and all times, to inspect the accounts, books, papers and documents of any public service company, and the commission, or any commissioner, may examine under oath any officer, agent or employee of such public service company in relation thereto, and with reference to the affairs of such company: PROVIDED, That any person other than a commissioner who shall make any such demand shall produce his authority from the commission to make such inspection.

[1961 c 14 § [80.04.070](#). Prior: 1911 c 117 § 77; RRS § 10415.]

RCW 80.04.380

Penalties — Violations by public service companies.

Every public service company, and all officers, agents and employees of any public service company, shall obey, observe and comply with every order, rule, direction or requirement made by the commission under authority of this title, so long as the same shall be and remain in force. Any public service company which shall violate or fail to comply with any provision of this title, or which fails, omits or neglects to obey, observe or comply with any order, rule, or any direction, demand or requirement of the commission, shall be subject to a penalty of not to exceed the sum of one thousand dollars for each and every offense. Every violation of any such order, direction or requirement of this title shall be a separate and distinct offense, and in case of a continuing violation every day's continuance thereof shall be and be deemed to be a separate and distinct offense.

[1961 c 14 § 80.04.380. Prior: 1911 c 117 § 94; RRS § 10443. Formerly RCW 80.04.380, part. FORMER PART OF SECTION: 1911 c 117 § 96 now in RCW 80.04.387.]

APPENDIX B



1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

UT-051136

**REGISTRATION, COMPETITIVE CLASSIFICATION,
AND INITIAL PRICE LIST OF
TELECOMMUNICATIONS COMPANIES**

All telecommunications companies must register with the Washington Utilities and Transportation Commission (WUTC) prior to beginning operations in the state of Washington. Refer to the following: RCW 80.36, WAC 480-121, 480-80, and 480-120.

TOLL FREE 1-888-606-9566 / FAX 360-586-1150
TTY 360-586-8203 or 1-800-416-5289
Website: www.wutc.wa.gov

The WUTC has a policy of providing equal access to its services. To request this document in alternate formats, please call 360-664-1133.

- ◆ Complete the application and initial price list forms. You may submit these forms to records@wutc.wa.gov as an electronic attachment.
- ◆ WUTC will issue a registration certificate with an effective date 30 days from the date the complete application is received and approved.
- ◆ When a filing has been submitted electronically all subsequent filings must also be submitted electronically.

Telecommunications Company Information

Name: WTI, LLC
Company Mailing Address: 22722 29th Dr SE #120
City/State/Zip: Bothell, WA 98021

d/b/a: Marathon Communications

Questions regarding this application should be directed to:

Name: Bob Baur
Phone Number: 425-949-0055 Fax Number: 425-415-8370 E-Mail: bbaur@marathon.net
Mailing Address: 22722 29th Dr. SE #120
City/State/Zip: Bothell, WA 98021

Registered Agent (A Washington Agent is required if the company is located outside Washington State):

Name:
Mailing Address:
City/State/Zip:

Name, address and title of each officer or director (attach separate documentation if additional space is needed) :

Name	Address	Title
Gary Keister	PO Box 1929 Port Townsend, WA 98368	Manager
Robert Manning	22722 29 th Dr. SE #120 Bothell, WA 98021	Manager
Bob Baur	22722 29 th Dr. SE #120 Bothell, WA 98021	Manager

Include the following:

- Current Balance Sheet Price List Latest Annual Report, if any

Competitive Classification

Check box if applicant is subject to effective competition and requests waiver of the regulatory requirements set forth in WAC 480-121-063 (1).

APPENDIX C



Billing Date: 06/10/07 Page 3 of 4
 Telephone Number : 425 774-2299 940321
 Account Number: 03 0242 1052544428 08
 How to Reach Us : See page 2

MONTHLY SERVICE - NON-BASIC (Jun 10 to Jul 10)			
Description	Qty	Unit Rate	
1 Remote Call Forwarding-meas addl	1	19.00	19.00
2 Remote call forwarding	1	19.00	19.00
Total			\$ 38.00
MISCELLANEOUS CHARGES AND CREDITS			
3 Late payment charge on \$87.58			5.00
Total			\$ 5.00
NON-BASIC SERVICE TAXES AND SURCHARGES			
4 Federal excise tax			1.17
5 City utility tax			1.14
6 State & Local Sales Tax			3.48
Total			\$ 5.79
<i>Verizon non-basic charges **</i>			<i>\$ 48.79</i>
**Non-payment of non-basic service charges WILL NOT result in the disconnection of your local telephone service.			
Total Verizon charges			\$ 48.79

Verizon Reads

If you have checked the box on the first page of your phone bill or called your local business office and signed up to be a Literacy Champion, a tax deductible \$1 donation will be included monthly in the Verizon section of your bill. Contributions will benefit Verizon Reads, a non-profit effort supporting literacy programs. Even if you check the box or call the local business office to sign up, you are not required to pay the literacy donation. Phone service will not be terminated if you do not contribute. To discontinue your literacy donation, call the phone number on page two of your bill.

Your local toll provider is WORLD COMMUNICATIONS, INC.

You have selected WORLD COMMUNICATIONS, INC as your long distance provider.

425 774-2299

Notice: Your local toll provider has been changed from Marathon Communications, Inc. to WORLD COMMUNICATIONS, INC on May 26, 2007.

Cost of change: \$0.00

425 774-2299 :

Notice: Your long distance provider has been changed from Marathon Communications, Inc. to WORLD COMMUNICATIONS, INC on May 26, 2007.

Cost of change: \$0.00

FOR YOUR INFORMATION

Important billing information

When you provide a check, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process this transaction as a check. If you wish to be excluded from this process, please call 1-888-500-5358. When we use information from your check to make an electronic fund transfer, funds may be withdrawn from your account as soon as the same day we receive your payment, and you will not receive your check back from your financial institution.

APPENDIX D



January 10, 2008

<<FIRST_NAME>> <<LAST_NAME>>
<<STREET_ADDRESS>>
<<CITY>>, <<STATE>> <<ZIP>>

Dear <<FIRST_NAME>>,

WTI will cease offering local dialtone service to our customers as of February 10th, 2008.

To insure that you do not suffer a service interruption, please contact us at 1-800-919-1000 as soon as possible and we will guide you through the process of converting your local service to Qwest, Verizon or whichever available carrier you prefer.

This change applies to local service only. Any long distance service you have through WTI will remain unaffected.

If we have already contacted you about the change in service offerings and/or assisted you in establishing local service with another carrier please feel free to disregard this notice.

Thank you,

WTI Customer Care

APPENDIX E

	Complaint Number	Staff Assigned	Comments
1.	102458	N. Paulson	<p>This service-affecting complaint was passed on January 10, 2008. A response was due by 5:00p.m., on January 14. WTI did not provide its response to the complaint until January 16, 2008.</p> <p>Two violations of WAC 480-120-166(6), one violation of WAC 480-120-083(2)(c), WAC 480-120-083(4)(d)(i) and one violation of WAC 480-120-083(4)(c) were recorded.</p>
2.	102616	R. Kouchi	<p>This complaint was passed on January 29, 2008. A response was due, and received, on February 5, 2008.</p> <p>One violation of WAC 480-120-083(2) and one violation of 480-120-083(4)(d) were recorded.</p>
3.	102910	M. Meeks	<p>This service-affecting complaint was passed on February 26, 2008. A response was due on February 29, 2008. WTI provided its initial response after business hours on March 12, 2008.</p> <p>This customer’s service was disconnected. Customer alleged no prior notification of impending disconnection was received.</p> <p>Nine violations of WAC 480-120-166(6), one violation of WAC 480-120-083(2) and one violation of 480-120-083(4)(d) were recorded.</p>
4.	102917	N. Paulson	<p>This service-affecting complaint was passed on February 26, 2008. A response was due by 5:00p.m., on February 28, 2008. WTI did not provide its initial response timely. On March 12, 2008, staff notified WTI that additional violations were being recorded and that daily violations would continue to accrue until such time as it responded. WTI responded after business hours that same day. This customer’s service was disconnected. Customer alleged no prior notification of disconnection was received.</p> <p>Nine violations of WAC 480-120-166(6) and one violation of WAC 480-120-083(2)(c) were recorded.</p>

Staff Investigation – WTI, LLC

	Complaint Number	Staff Assigned	Comments
5.	102918	N. Paulson / S. Stillwell	<p>This service-affecting complaint was passed on February 26, 2008. A response was due by 5:00p.m., on February 28, 2008. On March 12, 2008, staff notified WTI that nine violations of WAC 480-120-166(6) were being recorded due to WTI's lack of response to the complaint. WTI provided its initial response on March 14, 2008. This customer's multiple-line service was disconnected. Customer alleged no prior notification of disconnection was received.</p> <p>Eleven violations of WAC 480-120-166(6), one violation of WAC 480-120-083(2)(c), one violation of WAC 480-120-083(4)(c) and one violation of WAC 480-120-083(4)(d) were recorded.</p>
6.	102922	M. Meeks	<p>This service-affecting complaint was passed on February 27, 2008. A response was due by 5:00p.m., on February 29, 2008. WTI provided its initial response on March 12, 2008. This customer's service was disconnected. Customer alleged no prior notification of disconnection was received.</p> <p>Eight violations of WAC 480-120-166(6), one violation of WAC 480-120-083(2) and one violation of WAC 480-120-083(4)(d) were recorded.</p>
7.	102924	N. Paulson	<p>This service-affecting complaint was passed on February 27, 2008. A response was due by 5:00p.m., on February 29, 2008. WTI provided its initial response on March 12, 2008. This customer's service was disconnected. Customer alleged no prior notification of disconnection was received.</p> <p>Eight violations of WAC 480-120-166(6) and one violation of WAC 480-120-083(2)(c) were recorded.</p>

Staff Investigation – WTI, LLC

	Complaint Number	Staff Assigned	Comments
8.	102970	G. Griffin-Wallace	<p>This service-affecting complaint was passed on March 3, 2008. A response was due by 5:00p.m., on March 5, 2008. Staff did not receive a response, so on March 7, 2008, staff sent another e-mail requesting a response. That same day Marcos Melendez responded stating he had not received the complaint on March 3, 2008. The complaint was re-passed to Susan Hunich that same day, however, the company did not respond until March 12, 2008. This customer's service was disconnected. Customer alleged no prior notification of disconnection was received.</p> <p>One violation of WAC 480-120-166(6) and one violation of WAC 480-120-083(4)(d) were recorded.</p>
9.	103037	D. Shutler	<p>This service-affecting complaint was passed on March 11, 2008. A response was due by 5:00p.m., on March 13, 2008. On March 17, 2008, staff notified WTI that two violations of WAC 480-120-166(6) had been recorded, and stated that daily violations would be recorded until such time as an initial-response was received. WTI provided its initial response on March 20, 2008. This customer's service was disconnected. Customer alleged no prior notification of disconnection was received.</p> <p>Five violations of WAC 480-120-166(6), one violation of WAC 480-120-083(2)(c), one violation of WAC 480-120-083(4)(c) and one violation of WAC 480-120-083(4)(d) were recorded.</p>

APPENDIX F

Hoyt, Sheri (UTC)

From: Trisha Smith [tsmith@wtillc.com]
Sent: Thursday, March 27, 2008 10:22 AM
To: Hoyt, Sheri (UTC)
Subject: RE: WTI, LLC annual reports

Sheri-

Of those 55, some were coded as service levels other than local resale in our billing system and so did not turn up in a printout of the customers, some were on our reseller account but did not have WTI accounts, some had left WTI and transferred their service back to Qwest but had never been taken off our account by Qwest, and some did not respond to our attempts to contact them.

Trisha

-----Original Message-----

From: Hoyt, Sheri (UTC) [mailto:SHoyt@utc.wa.gov]
Sent: Thursday, March 27, 2008 9:24 AM
To: Trisha Smith
Subject: RE: WTI, LLC annual reports

Trisha,

Upon further review of your response, I have one more clarifying question. You said there were "55 customers who lost dialtone service that we were unaware of..." What does that mean? In what way was WTI unaware of its own customers?

Thank you,
Sheri

-----Original Message-----

From: Trisha Smith [mailto:tsmith@wtillc.com]
Sent: Wednesday, March 26, 2008 11:39 AM
To: Hoyt, Sheri (UTC)
Subject: RE: WTI, LLC annual reports

To my understanding that is how it works.

-----Original Message-----

From: Hoyt, Sheri (UTC) [mailto:SHoyt@utc.wa.gov]
Sent: Wednesday, March 26, 2008 11:33 AM
To: Trisha Smith
Subject: RE: WTI, LLC annual reports

So, if I understand this correctly, WTI purchases service directly from Qwest (and Verizon) and then repackages and bills WTI customers? There's no other company in the middle? The reason I ask is that information we received indicates there's another company in the middle. I wondered if that's why WTI stated on its annual report that it did not provide dial-tone services.

Thanks,
Sheri

Staff Investigation – WTI, LLC

-----Original Message-----

From: Trisha Smith [mailto:tsmith@wtillc.com]
Sent: Wednesday, March 26, 2008 11:33 AM
To: Hoyt, Sheri (UTC)
Subject: RE: WTI, LLC annual reports

Regional Bell Operating Company ie. Qwest and Verizon.

-----Original Message-----

From: Hoyt, Sheri (UTC) [mailto:SHoyt@utc.wa.gov]
Sent: Wednesday, March 26, 2008 11:25 AM
To: Trisha Smith
Subject: RE: WTI, LLC annual reports

Ms. Smith.

Thank you for your quick response. Can you clarify one point for me, please. You say WTI resells "RBOC" dial-tone services. What is "RBOC"?

Thank you,
Sheri

-----Original Message-----

From: Trisha Smith [mailto:tsmith@wtillc.com]
Sent: Wednesday, March 26, 2008 11:25 AM
To: Hoyt, Sheri (UTC)
Cc: Robert Manning
Subject: WTI, LLC annual reports

Sheri Hoyt-

To the best of my ability here is our count as to how many customers were affected in Qwest's and Verizon's territory:

Qwest - 451 customers switched their dialtone service back to Qwest using transition.
68 went with another provider of their choice.
8 customers cancelled - either switched to another provider or decided to use cell phones.
23 customers we were unable to contact, either they did not have voicemail or would not return our calls.
55 customers who lost dialtone service that we were unaware of, we assisted getting their dialtone service restored with Qwest.

Verizon - 159 customers were identified.

In regards to the annual reports stating that WTI does not provide dial- tone service, it appears there may have been some confusion regarding how we should answer. Our customers that are being billed for dialtone, we do not provide it off our switch, but rather resell RBOC dialtone services.

They

provide the service, bill us for it and we bill the customers, but for technical issues, outages, etc we have to put in a trouble ticket with the RBOC. So, when asked how many lines we provide local exchange service to, the person filling this form out answered that we did not provide local exchange service.

Staff Investigation – WTI, LLC

There have been three Seattle area business clients who connect via T-1 to our switch but those exceptions are by special arrangement. To someone thinking of our local service customers as being the standard WTI Qwest & Verizon local service resale accounts one might understand why they would say that we don't provide local exchange services, we only invoice for services provided by others.

I hope this answers your questions, please let us know how to proceed from here.

Thank you,

Trisha Smith
Controller
WTI, LLC
22722 29th Dr. SE #120
Bothell, WA 98021
P (425) 949-0051
F (425) 350-7426
tsmith@wtillc.com

Hoyt, Sheri (UTC)

From: Hoyt, Sheri (UTC)
Sent: Monday, March 24, 2008 1:54 PM
To: 'rmanning@wtillc.com'
Subject: WTI, LLC annual reports
Attachments: WTI LLC 2006 Annual Report.pdf; WTI LLC 2005 Annual Report.pdf

Importance: High

Good afternoon Mr. Manning,

You are listed on WTI, LLC's (WTI) 2005 and 2006 annual reports as the person inquiries regarding the reports should be directed to. As you may know, the Utilities and Transportation Commission's Consumer Affairs Office has received numerous consumer complaints in the last few months regarding WTI's cessation of dial-tone service. I understand that the WTI customers that reside in Qwest Corporation's (Qwest) territory were disconnected at the end of February and that customers in Verizon Northwest, Inc.'s (Verizon) territory are due to be disconnected mid-April.

With this communication, I'm requesting information from WTI as to how many customers were affected in Qwest's territory and how many were affected in Verizon's territory. In addition, are there other Washington customers that will be affected by WTI's cessation of providing dial-tone service?

To this communication I have attached the last two annual reports filed by you on behalf of WTI (years 2005 and 2006). Can you please explain why the annual reports say WTI does not provide dial-tone service (section three, number four), yet WTI customers have been receiving dial-tone service and the letters WTI has sent out regarding the cessation of dial-tone service surely indicate WTI has been providing dial-tone service in Washington?

You may direct your response to me, I can be reached by phone at (360) 664-1149 or via e-mail at shoyt@utc.wa.gov. I look forward to receiving your reply within the week. If that is not ample time to respond to my questions, please provide me a date by which you will respond to this inquiry.

Sincerely,

Sheri Hoyt
Compliance Specialist
Business Practices Investigations
Washington Utilities and Transportation Commission
Phone: (36) 664-1149
Fax: (360) 586-1150
E-mail: shoyt@utc.wa.gov

APPENDIX G



March 13, 2008

Customer
Address
City, State, Zip Code

WTI will cease reselling Verizon local dial tone service to our customers as of April 15th, 2008. Our records show that you have dial tone service with us at one or more locations that will be affected by this decision.

To insure that you do not suffer a service interruption or lose your phone number, please contact us at 1-800-919-1000 as soon as possible so that we may guide you through the process of converting your local service to Verizon or an available carrier of your choosing.

This change applies to local service only. Any long distance services you may have through WTI will remain unaffected, though we remind you that active dial tone service is required to place and receive calls.

If we have already assisted you in establishing local service with another carrier or you no longer have local dial tone service through WTI, please disregard this notice.

Thank you,

WTI Customer Care