

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	
)	
TCG SEATTLE)	DOCKET NO. UT-941204
)	
for Classification as a Competitive)	ORDER GRANTING PETITION
Telecommunications Company)	
.)	

SUMMARY

SCOPE OF PROCEEDINGS: On September 16, 1994, TCG Seattle (TCG) filed with the Commission a petition for classification as a telecommunications company, and for waiver of certain regulatory requirements. TCG seeks competitive classification for its proposal to provide both dedicated services and the following switched services: intra-LATA toll, centrex services, intra-exchange switched services, payphone services, and switched access services.

The Commission, on January 19, 1995, served a Notice of Formal Investigation and Fact-Finding (FIFF) upon interested persons, and set a February 6, 1995, deadline for the filing of written petitions to intervene, and objections to use of the FIFF process. Interventions were filed by the Washington Independent Telephone Association (WITA) and U S WEST Communications, Inc. (U S WEST), on February 3 and 6, 1995, respectively. In an April 12, 1995 letter to parties of record, the Commission established the filing dates for written submissions upon the petition.

COMMISSION: The Commission grants the petition of TCG for competitive classification and approves its request for the waivers delineated in Attachment A to this Order.

MEMORANDUM

I. Background

The Commission on its own motion determined that on the face of the petition, no substantial issues of controversy were presented and invoked the provisions of WAC 480-09-520, Formal investigation and fact-finding. The interventions of both U S WEST and WITA were granted; U S WEST indicated in its petition to intervene it did not object to use of the FIFF process, and WITA later withdrew its objection to Commission use of the FIFF process, which it initially raised in its petition to intervene.

Commission Staff filed its comments on the TCG petition on May 12, 1995, and WITA filed its comments on May 15, 1995. U S WEST notified the Commission it would not submit initial comments but would file reply comments as authorized by the Commission's April 12, 1995 letter. Reply comments were filed by Commission Staff and TCG on May 26, 1995, and U S WEST on May 30, 1995. WITA notified the Commission it would not reply.

II. TCG Petition for Competitive Classification

In its petition, TCG proposes to provide the following switched services: intra-LATA toll, centrex services, intra-exchange switched services, payphone services, and switched access services. TCG identifies the relevant geographic market for these services as the state of Washington, and lists U S WEST, GTE Northwest Incorporated, and other local exchange carriers as competitors offering the same, similar, or comparable services. TCG indicates it will have a zero percent market share of the switched telecommunications market.

TCG petitions for classification as a competitive telecommunications company for both its dedicated and intra-state, intra-exchange switched telecommunications service offerings.¹ In conjunction with its petition for competitive classification, TCG seeks waiver of the following regulatory requirements:

¹ On April 21, 1994, Digital Direct of Seattle, Inc. (DDS), filed with the Commission, in Docket No. UT-940529, a petition to amend its registration as a telecommunications company to provide intra-exchange and inter-exchange switched services; the petition was approved May 25, 1994. Also on April 21, 1994, in Docket No. UT-940530, DDS petitioned for an amendment to its competitive classification to include switched telecommunications services. No action has been taken on this petition, and the matter should be closed as a result of our decision in the instant case.

On April 21, 1994, TCG Seattle filed with the Commission, in Docket No. UT-940531, an application to acquire the assets of Digital Direct of Seattle, Inc., which was which previously registered as a telecommunications company and received competitive classification for its dedicated services in Docket Nos. UT-910776, -910777, respectively. The TCG application was approved on November 9, 1994. On September 16, 1994, TCG filed its application for registration as a telecommunications company, in Docket No. UT-941203, which was approved by the Commission on November 9, 1994.

○	RCW 80.04.250	Property Valuation
○	RCW 80.04.300	Budgets to be Filed
○	RCW 80.04.310	Expenditures
○	RCW 80.04.320	Budget Rules
○	RCW 80.04.330	Unauthorized Expenditures
○	RCW 80.04.350	Depreciation
○	RCW 80.04.360	Exceeding Rates
○	RCW 80.04.460	Accident Investigation
○	ch. 80.08 RCW	Securities
○	ch. 80.12 RCW	Transfers of Property
○	ch. 80.16 RCW	Affiliated Interests
○	RCW 80.36.100	Tariff Schedules
○	RCW 80.36.110	Tariff Changes
○	RCW 80.36.150	Contracts to be Filed
○	ch. 480-80 WAC	Tariffs
○	WAC 480-120-026	Tariffs
○	WAC 480-120-031	Accounting
○	WAC 480-120-032	Political Activities
○	WAC 480-120-036	Finance
○	WAC 480-120-042	Directory Assistance
○	WAC 480-120-046	Service Offered
○	WAC 480-120-066	Contract for Service
○	WAC 480-120-081	Discontinuance of Service
○	WAC 480-120-106	Form of Bills
○	WAC 480-120-131	Accident Reports
○	ch. 480-140 WAC	Budgets
○	ch. 480-143 WAC	Transfers of Property
○	ch. 480-146 WAC	Securities and Affiliated Interests

TCG contends that because competition serves the same purpose as public interest regulation, these regulatory requirements are not needed to ensure that its rates and practices will be just, reasonable, and otherwise lawful.

TCG submitted three attachments to its petition which describe the services it proposes to offer, the facilities it will utilize, and the prices for its services. TCG proposes to offer switched services for transmission at variable speeds and formats consistent with customers' needs, over leased or owned fiber optic facilities, using a digital switch. TCG will offer inter-exchange service, consisting primarily of intra-LATA toll and switched access services, and voice and data intra-exchange switched service.

TCG has acquired the existing facilities of Digital Direct of Seattle, Inc. (DDS), which operated a fiber optic digital network. TCG succeeds to DDS's other fiber optic capacity and telecommunications services from other entities,

including tariffed telecommunications services and facilities under lease or contract. TCG has adopted price lists of its predecessor DDS in substantially the same form as those for dedicated services and switched services.

III. Petitions to Intervene

A. WITA

WITA urges that its participation will not broaden the issues beyond those asserted by the TCG petition. WITA's primary interests include exploring the basis of the competitive classification of TCG, the scope of waivers sought, and the geographic scope of the petition. WITA also expresses interest in "(1) the existence of captive customers, (2) the responsibilities of carrier of last resort, (3) use of individual contract rates in price lists, and the need for an access tariff, among others."

B. U S WEST

US WEST states that it will not expand issues beyond those posited by the TCG petition, nor unduly prolong the proceeding. It does not object to use of the FIFF process. Principally, U S WEST questions "whether and under what circumstances it is appropriate for TCG SEATTLE to be classified as an effectively competitive company when it will necessarily be obligated to provide access services to enable competing carriers to reach TCG SEATTLE customers where there are no competitive alternatives available to those connecting carriers."

IV. Comments of Parties

A. Initial Comments

1. Commission Staff

Commission Staff first addresses U S WEST's claim, to which WITA's petition to intervene also alluded, that it is a captive customer of TCG for traffic terminating on TCG's network. Staff maintains U S WEST's reasoning is flawed because it fails to consider end-users' interest in the pricing of access services. Staff asserts that "TCG's business is providing interconnection access to its customers, not limiting interconnection access."

If TCG could exercise market power over a captive U S WEST, it would also be exercising market power over a captive customer base, according to Staff's reasoning. Staff contends TCG's end-use customers are not "captive," because there are reasonably available alternative service providers.² Staff therefore concludes TCG cannot hold captive U S WEST or any other connecting carrier.

Commission Staff argues there are numerous issues preventing effective competition in the local exchange market and that pending their resolution the local exchange company (LEC) incumbents' market position is preserved. Staff cites the following prerequisites to effective local exchange competition:

- (1) central office interconnection arrangements;
- (2) connections to unbundled network elements;
- (3) seamless integration into LEC inter-office networks;
- (4) seamless integration into LEC signalling networks;
- (5) equal status in, control of, network databases;
- (6) local number portability;
- (7) reciprocal inter-carrier compensation arrangements;
- (8) equal rights to, control over, number resources;
- (9) cooperative practices and procedures;
- (10) economically efficient pricing signals; and
- (11) intra-LATA equal access.

Without an effectively competitive local exchange market, the incumbent LECs retain their market power; TCG's customers always have the option of obtaining their service from U S WEST. Staff contends TCG cannot and will not have the "significant captive customer base" contemplated by RCW 80.36.320.

Commission Staff addressed the other concerns of WITA to the extent they were developed in its petition to intervene. Staff argues TCG's petition meets the criteria in RCW 80.36.320 and WAC 480-120-023 and therefore lays a proper basis for competitive classification.

Commission Staff supports the waivers sought by TCG, except the following:

² Staff identifies competitors in addition to incumbent local exchange companies and recently registered competitive access providers to include resellers of centrex-type services, radio communications companies (cellular providers), private systems, radio systems, and private shared telecommunications service providers.

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RCW 80.36.150, Contracts to be filed -- Staff believes competitively classified companies should continue to file with the Commission any contract, agreement, or arrangement, as defined in this statute and in WAC 480-120-027.

WAC 480-120-042, Directory service -- The question of whether competitive companies should be required to publish telephone directories listing their subscribers is under Commission consideration in pending Docket No. UT-941464. Staff recommends denying the waiver until the Commission decides the issue in that docket.

WAC 480-120-081, Discontinuance of service -- Staff recommends TCG be required to follow these disconnect procedures to ensure a reasonable and protective process for all consumers.

Since TCG is subject to effective competition throughout the state, the Commission Staff argues that the geographic scope of the petition is appropriately statewide. The staff also notes that the Commission will retain jurisdiction to order TCG to provide service to all customers pursuant to RCW 80.36.090, Service to be furnished on demand, TCG has not requested waiver of this statute.

Responding to a WITA concern that TCG proposes to use individual contract rates in price lists, the Commission Staff argues that WAC 480-120-027, Price lists, describes use of both price lists and contracts for competitively classified companies. The Commission Staff has supported the use of individual contract rates in the past, and believes TCG's use of such rates is appropriate.

2. WITA

WITA's concern is the classification of companies as competitive on a statewide basis for all of their services, including access service. WITA questions whether it is appropriate to consider the state of Washington as the relevant market, where a company is seeking to operate in a limited geographic area at the time it seeks to be classified as a competitive telecommunications company.

WITA believes the relevant market should be the service area that the company can reasonably expect to serve at the time of the application. It believes the company should have to seek to amend its classification to include a greater geographic area as it grows and expands.

WITA argues that if the relevant market for intraexchange switched services is the entire state of Washington, then it will be difficult for the Commission to deny WITA's members competitive classification, should they choose to apply.

WITA also questions whether access service provided to interexchange carriers is a "service", as that term is used in RCW 80.36.320. If yes, then it asks whether interexchange carriers are a "significant captive customer base" as that phrase is used in the same statute. WITA argues that in order to be classified as competitive under RCW 80.36.320 a company must demonstrate that the services it offers are subject to effective competition. It then argues that in order to have effective competition, a company must not have a significant captive customer base. Finally, it posits that the customers for access services are interexchange carriers

WITA believes that access service is a telecommunications service, and that RCW 80.36.320 makes no distinction between whether a service is offered to a residential or business customer or to an interexchange carrier. It argues that for interexchange carriers TCG has a captive customer base of 100%. Based on these premises, WITA concludes that the Commission does not have authority to classify TCG as a competitive communications company.

Although WITA asserts the Commission lacks authority to grant competitive classification, it does not object to TCG being allowed to offer services to residential and business customers in the Seattle/Bellevue/Everett vicinity. It states that its concern is with the breadth of Commission decisions defining "relevant market" and the "provision of services to a captive customer base." WITA recommends the Commission classify the services that TCG desires to offer to residential and business customers as competitive services, but not grant competitive company classification.

3. U S WEST

U S West did not file opening comments. It submitted a letter stating its position that as a matter of law a local exchange company has significant captive customers for carrier access services.

B. Reply Comments

1. TCG

TCG states that it seeks classification as a competitive telecommunications company to provide essentially the same services offered by Electric Lightwave, Inc., and Tel-West Central Services, Inc., both of which the Commission recently classified as competitive.³ TCG argues it has demonstrated that it fully and independently satisfies the requirements for classification in RCW 80.36.320 and WAC 480-120-023. TCG notes WITA and U S WEST do not challenge TCG's petition on factual grounds, but rather they challenge TCG and the Commission's statutory interpretation. TCG argues the intervenors have not presented any justification for the Commission to depart from its earlier decisions.⁴

In response to the issues raised by WITA, TCG argues the state of Washington is the appropriate "relevant market." TCG notes that the Commission has considered the "relevant market" to be the state of Washington in prior proceedings and, that the Washington State Supreme Court has already upheld the Commission's statutory interpretation of this term.⁵

TCG contests WITA's allegation the Commission will be required to grant competitive classification to WITA customers though each controls only a small percentage of the total access lines in the state of Washington. First, it notes that RCW 80.36.320 defines effective competition in terms of the alternatives available to "the company's customers," and argues the customers of WITA member companies have no reasonably available alternatives for local exchange service. Second, TCG argues that each of these companies has a "significant captive customer base." Third, it argues that WITA's suggestion that companies be competitively classified only for the geographic area in which they initially offer service is a thinly veiled attempt to insulate WITA members from future competition.

³ Order Granting Petition, Docket No. UT-940403, January 11, 1995 [ELI]

Order Granting Petition, Docket No. UT-940691, February 1, 1995 [TEL-WEST]

⁴ Id.

⁵ In re Consolidated Cases, 123 Wn.2d 530, 547 (1994).

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TCG next argues that interexchange carriers and incumbent LECs do not represent a "significant captive customer base" for competitive local exchange companies. TCG notes the Commission has previously rejected this argument.⁶ TCG agrees with Commission Staff that the proper statutory focus is on end-user customers, not carrier customers. TCG argues it exercises no market power over its end-user customers, and that its self-interest lies in maximizing interconnection with interexchange carriers and other local exchange carriers.

TCG claims the WITA argument ignores RCW 80.36.160, which specifically authorizes the Commission to regulate, and if necessary to require, carrier interconnection, i.e., "access services," as well as to establish reasonable rates, terms, and conditions of interconnection. Viewed in light of the entire statute, it claims RCW 80.36.320 clearly contemplates that "customers" and "services" were intended to refer to end-user customers and services, not carriers.

TCG contests Staff's recommendations with regard to some of TCG's waiver requests. TCG continues to seek waiver of RCW 80.36.150, Contracts to be filed, WAC 480-120-042, Directory service, and WAC 480-120-081, Discontinuance of service. It argues that filing contracts would be an administrative burden on the company and on the Commission, and that contract filings provide its competitors with a list of TCG's customers.

TCG acknowledges directory service is an issue in the interconnection proceeding⁷, and argues that testimony in that proceeding demonstrates other local exchange competitors have been unable to obtain listings for their customers on reasonable terms and conditions in the U S WEST Direct White Pages. It argues that a requirement it publish its own separate directory is unnecessarily expensive and wasteful, and will result in customer confusion. If the Commission refuses to waive WAC 480-120-042, TCG asks the Commission provide that it may comply with this requirement by having its customers listed in the U S WEST Direct White Pages, and that the terms and conditions of such listings are reasonable and nondiscriminatory.

⁶ See, footnote 3, *supra*.

⁷ Washington Utilities and Transportation Commission v. U S WEST Communications, Inc., Docket No. UT-941464

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Finally, TCG argues WAC 480-120-081 is directed to a monopoly provider of service, and that the market will ensure the fairness of TCG's discontinuance of service policies. TCG concludes it has met all of the requirements for classification as a competitive telecommunications company.

2. Commission Staff

Commission Staff responds to the two issues raised by WITA. Staff continues to recommend approval of TCG's petition. Regarding WITA's issue of relevant market, Staff notes the term relevant market has been applied two ways: the relevant market of the service itself, and the relevant market in a certain geographic area. Staff further notes all of the services TCG offers are available in a functionally equivalent form from alternative providers at competitive prices. Staff does not consider TCG's relevant market as to the service, in this case telecommunications services, as a barrier to being classified competitive.

Commission Staff next argues TCG's relevant market is defined by any geographic area in which the company can technically and feasibly offer service to the public. If TCG expands its operating territory into any other geographic area in the state, TCG will meet effective competition from the incumbent LEC serving that area. Staff distinguishes TCG from WITA companies because, unlike TCG, the WITA companies enjoy 100% market power in their service territories; until competitive entry occurs in any given WITA company territory, each WITA company serves exclusively captive customers.

Commission Staff maintains the Commission previously has denied arguments that a competitively classified company should face geographic limitations, citing In re Digital Direct of Seattle, Inc., Docket Nos. UT-910776 and UT-910777, Fifth Supplemental Order, April 20, 1993. Staff contends there is no public interest basis to impose a geographic limitation for TCG's operations.

Commission Staff addresses the issue of captive customers in regard to access services in its first round comments. It states that its comments there fully address WITA's arguments on this issue.

3. WITA

WITA did not file rebuttal comments. It submitted a letter stating it reaffirms its comments in the initial round.

4. U S WEST

U S WEST asserts the Commission has to date, in two previous competitive classification proceedings,⁸ refused to: "(1) address the fact that all new entrant local exchange companies, like existing companies, by definition have significant (100% of the possible customers) captive carrier customers for their interconnection or carrier access services; and (2) how this fact can be reconciled with the language of [RCW 80.36.320]." U S WEST contends that carrier access services are "services" and carrier customers are "customers" under this statute and that the Commission cannot escape the conclusion that TCG has significant captive customers of a service and does not qualify for competitive classification under its provisions.

U S WEST argues the Commission Staff's interpretation, and the Commission's prior orders, have reduced the requirements of RCW 80.36.320 to an analysis of a company's market power over end-use customers, and have ignored the clear definition of effective competition. U S WEST reads the definition to require that all of a company's customers must have reasonably available alternatives and a company must not have a significant captive customer base for any service. U S WEST has always contended these new entrants have absolute monopoly power over access by other carriers to its end-use customers.

Finally, U S WEST contends the Commission's prior orders are in error in their assumption that under current conditions in the local exchange market new entrants cannot gain market share. U S WEST cites the 11 "prerequisites" to effective competition in the local exchange market urged by Staff and apparently adopted by the Commission. According to U S WEST, Staff has not discussed with regard to TCG 1) the existing network available to TCG through its cable partners, 2) its access to capital from foreign and domestic monopolies, 3) its marketing advantage in bundling inter-LATA toll with local exchange wireline, wireless, and cable services, 4) its avoidance of regulatory oversight, and 5) the interconnection provided by U S WEST and the provisioning of all its requests for facilities and services without charge pending resolution of price issues in Docket No. UT-941464.

⁸ See, footnote 3, supra.

V. Commission Discussion and Decision

RCW 80.36.320 governs competitive telecommunications company classification. Pursuant to RCW 80.36.320, the Commission will approve such petitions if it finds the services offered or proposed to be offered are subject to effective competition. Effective competition means the petitioning company's customers have reasonably available alternatives to petitioner, and the petitioning company does not have a significant captive customer base.

In determining whether TCG is a competitive telecommunications company in its provision of switched intra-state intra-exchange services, the Commission must consider factors including, but not limited to:

- o the number and size of alternative services providers;
- o the extent to which these services are available from alternative providers in the relevant market;
- o the ability of alternative providers to make functionally equivalent or substitute services readily available at competitive rates, terms, and conditions; and,
- o other indicators of market power which may include market share, growth in market share, ease of entry, and the affiliation of providers of services.

WAC 480-120-023 establishes both the form and content requirements governing petitions for competitive classification.

Rules involved in this proceeding include WAC 480-09-520, and WAC 480-120-022, WAC 480-120-023, WAC 480-120-024, and WAC 480-120-025. Statutes invoked include RCW 80.36.145 and RCW 80.36.320. The issue for Commission determination is whether TCG should be classified as a competitive telecommunications company in its provision of dedicated and switched services, and the extent to which it should be relieved of regulatory requirements to which it would otherwise be subject.

The Commission has reviewed again the arguments of U S WEST and WITA regarding the meaning of the terms "services" and "customers" in RCW 80.36.320, notwithstanding our previous interpretation of those terms in other classification proceedings. Nevertheless, the Commission is not swayed in its reading of the intent of the statute, nor its interpretation of the terms "services" and "customers" in the statute.

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The Commission simply does not find logical the interpretation of RCW 80.36.320 urged upon us by U S WEST and WITA. Rather, we find the interpretation and analysis of both Commission Staff and TCG to be more relevant to the issues posited by the TCG petition, and to more closely comport with our view of legislative intent and actual experience to date of the telecommunications industry in this state.

The Commission likewise does not agree with the WITA argument that TCG's competitive classification should be limited to a specified geographic area. In light of our Supreme Court's opinion in In re Consolidated Cases and the comments of TCG and Commission Staff, we believe the relevant market is the state of Washington. We do not accept WITA's characterization of the TCG petition as "seeking" to serve only a limited area, nor with WITA's suggestion that we subject ourselves and companies to multiple petitions and amendments of a competitive company classification.

TCG clearly has no market power whatsoever, other than any advantage that may be gained by efficient provision of competitive services through innovation in technology and network operations. Until the minimum prerequisites for local exchange competition have been addressed by U S WEST, it is unlikely that TCG's status as a competitive company will change.⁹

Finally, the Commission finds TCG has fully and independently satisfied the requirements of RCW 80.36.320. Having said that, however, we do not approve the full list of waivers requested by TCG. Specifically, the Commission will not grant a waiver of RCW 80.36.150 is denied. TCG's current price list on file with the Commission explicitly provides that rates for dedicated non-switched services are to be negotiated on an individual case basis. The Commission believes the public interest requires that we continue to be able to monitor pricing activity in TCG's business transactions as a regulated telecommunications company. Therefore, TCG will be subject to the minimal administrative procedures required by compliance with RCW 80.36.150, as delineated in WAC 480-120-027.

Neither will the Commission waive WAC 480-120-042 at this time. Because this issue is under consideration in pending Docket No. UT-941464, the Commission will permit TCG to renew its request by letter for waiver of compliance with this rule if appropriate under the Commission's final order in that proceeding. Lastly, the Commission will require compliance with WAC 480-120-081 regarding "discontinuance of service." The Commission believes all applicable consumer rules must remain in force for all telecommunications for the foreseeable future.

⁹ The Commission has invited U S WEST to address such issues on numerous occasions, including the Notice of Inquiry on a Successor Alternative Form of Regulation, Docket No. UT-931349. December 3, 1993.

Based upon the entire record and the file in this matter, the Commission makes the following findings of fact and conclusions of law.

FINDINGS OF FACT

- 1. Petitioner TCG Seattle is registered as a competitive telecommunications company with the Commission, providing dedicated and switched telecommunications services.
- 2. Alternative providers of services to those offered by TCG include U S WEST Communications, Inc., GTE Northwest Incorporated, Enhanced Telemanagement, Inc., MetroNet Services Corporation, and others. All services are fully available from alternative providers in the relevant market.
- 3. The relevant market is the state of Washington.
- 4. TCG has no captive customer base.
- 5. The services offered by TCG are subject to effective competition.

CONCLUSIONS OF LAW

- 1. TCG should be permitted to provide services under price list.
- 2. TCG requested waivers of certain laws and rules relating to telecommunications services. The laws and rules for which waivers should be granted are listed on Appendix A, attached and by this reference made a part of this Order.

ORDER

THE COMMISSION ORDERS:

- 1. The petition of TCG Seattle for an order granting amendment to competitive classification is granted.
- 2. Waivers of the laws and rules listed in Appendix A, attached and by this reference made a part of this Order, are granted.
- 3. TCG Seattle is authorized to offer services under price list, the format of which is subject to prior approval by the Commission, to be effective after 10 days notice to the Commission and to customers. In the event of a price reduction or a change in terms or conditions which do not have rate impact,

personal notice to customers is not required. Although the Commission does not have authority to waive this notice requirement, petitioner does have the option to publish notice of price reductions by a display advertisement in such newspaper or newspapers as are geographically situated so as to be circulated over the company's service area.

DATED at Olympia, Washington, and effective this 30th day of June 1995.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

Sharon L. Nelson
SHARON L. NELSON, Chairman

Richard Hemstad
RICHARD HEMSTAD, Commissioner

Wm. R. Gillis
WILLIAM R. GILLIS, Commissioner

APPENDIX A

RCW 80.04.300, Budgets to be filed by companies;
RCW 80.04.320, Budget rules;
Chapter 80.08 RCW, Securities (except, RCW 80.08.140, State not obligated);
Chapter 80.12 RCW, Transfers of Property;
Chapter 80.16 RCW, Affiliated Interests;
RCW 80.36.100, Tariffs;
RCW 80.36.110, Tariff Changes;
Chapter 480-140 WAC, Budgets;
Chapter 480-143 WAC, Transfers of Property;
Chapter 480-146 WAC, Rules Relating to Securities and Affiliated Interests;
Chapter 480-80 WAC, Tariff Rules; and,
WAC 480-120-026, 480-120-032, 480-120-036, and 480-120-046,
General rules.