

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Rule-Making  
Proceeding Related To

Cessation of Certain Telecommunication  
Services: WAC 480-120-083

DOCKET NO. UT-010558

**Comments of Public Counsel**

**Attorney General of Washington**

October 4, 2001

Public Counsel files these comments in response to the Notice of Opportunity to Submit Written Comments dated September 12, 2001. Public Counsel supports the strengthened notice requirements of the new draft, but takes issue with two changes the Commission has made from previous drafts.

First, Public Counsel is curious as to why the Commission removed section 3(c) from the draft dated August 23, 2001. That section provided that notice to customers would include the Commission's consumer hotline phone number. Such a provision would ensure customers have an alternative resource from which to seek assistance if they experience unresolved difficulties during the transition process. Public Counsel requests that the Commission consider adding that provision to the rule.

Secondly, it was Public Counsel's understanding that Staff intended to add a provision requiring Commission approval of customer notices. We notice that such a provision was not

added, and would request that the Commission consider doing so. Given the unique circumstances that will likely surround a cessation of service, such an approval process will provide the Commission an opportunity to identify any additional disclosures that might be appropriate to ensure the most efficient transition process possible.

### **Conclusion**

Providing consumers with the Commission's hotline and requiring Commission approval of customer notices are two low-burden measures that could be taken to ensure that consumer interests are protected during a cessation of service.