

October 22, 2001

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Subject: **VERIZON COMMENTS – UT-991922 - CHAPTER 480-121 WAC; WAC
480-120-052; AND WAC 480-120-058**

Pursuant to the Commission's October 10, 2001 Notice of Consideration of Proposed Rulemakings (CR-102) and Notice of Extension of Comment Date, Verizon Northwest Inc. and Verizon Select Services Inc. ("Verizon") provide the following comments.

Chapter 480-121 WAC

480-121-020 Requirements for applications for registration, petitions for competitive classification, and initial price lists.

Verizon suggests that the title of this proposed rule be changed to "Requirements for applications for registration." The proposed rule does not have any specific language regarding the requirements for petitions for competitive classification or initial price lists.

For subsection (1)(b), Verizon suggests changing "Must" to "Can." The Commission should not mandate the requirement that companies must register and file for competitive classification at the same time. Companies should have the option to choose. Also, the draft rule assumes something that may not be true for every future registrant: that its services are subject to competition. With innovation and technological change, a new registrant could be offering a new service that would not be subject to effective competition by other companies' existing services.

480-121-062 Requirements for filing a petition for competitive classification of a telecommunications service.

As Verizon stated previously in its August comments, subsection (5)(h) should be deleted in order to streamline the competitive classification process. While the "must cover cost" requirement is found in the competitive service statute (RCW 80.36.330(3)), it is not a condition of granting a petition. Rather, it is a requirement that applies to the service once it is classified as competitive. If the Commission has reason to believe current rates for a service are below cost, it can always send a data request.

WAC 480-120-052 Prepaid calling services

For clarification purposes, Verizon suggests moving the language in subsection (6)(a)(iii) to subsection (2). The title of subsection (6) in the proposed rule has changed from "Verbal disclosure requirements" in the last draft to "Time of use disclosure requirements." Subsection (a)(iii) is no longer appropriate under subsection (6). Subsection (2) will read as follows:

- 2) PPCS providers must provide customers a without-charge telephone number staffed by personnel capable of ~~responding to~~:
- (a) Responding to technical problems or questions related to their service twenty-four hours a day, seven days a week; ~~and~~
 - (b) Responding to general account-related questions during regular business hours; and
 - (c) When requested, providing the commission's toll-free number and address to dissatisfied customers as required by WAC 480-120-101.

WAC 480-120-058 Protection of customer prepayments

Verizon has no further comment on proposed WAC 480-120-058.

Please direct any questions to Joan Gage at 425-261-5238.

Very truly yours,

Lida C. Tong
Director – Regulatory & Government Affairs