



UNITED TELEPHONE COMPANY OF THE NORTHWEST  
902 Wasco Street • Hood River, Oregon 97031

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March 05, 1991

Mr. Paul Curl, Secretary  
Washington Utilities and Transportation Commission  
Box 9022  
Olympia, WA 98504-9022

Ladies and Gentlemen:

Enclosed please find the comments of United Telephone Company of the Northwest in Docket No. UT-900726.

If you have any questions or comments, please feel free to contact me at the address above or by calling (503) 387-9290.

Sincerely,

A handwritten signature in cursive script that reads "Glenn Harris".

Glenn Harris  
Regulatory Relations Administrator

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

UT-900726

In the Matter of Proposed Amendments)  
to WAC 480-120-021, -106, -138, and )  
-141 Relating to Glossary, Alternate)  
Operator Services, Pay Telephones, )  
Form of Bills )

COMMENTS OF UNITED TELEPHONE  
COMPANY OF THE NORTHWEST

United Telephone Company of the Northwest supports adoption of the proposed rules with the exception of including local exchange companies as alternate operator services. United believes that the rules should apply only to companies who do not file their rates for operator services through the normal tariff process. We believe the current tariff process already provides the protection that this rule would seek to impose on local exchange companies.

None of the innumerable problems that customers face in their use of alternative operator services and customer-owned pay telephones have anything to do with the services provided by local exchange companies. There is no history of such problems regarding LECs, nor are there currently any such complaints from customer.

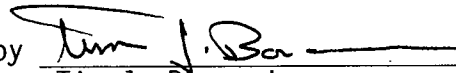
Not only are there no good policy reasons to include local exchange companies under this rule, there are good policy reasons not to--primarily the added burden of expense and administrative time, not to mention customer confusion, that would result. For example, the filing, every six months, of a current list of the customers United serves, along with their locations and telephone numbers, would be tantamount to issuing an extra telephone directory

for each exchange every year.

At a minimum, the rule as proposed would have to be re-thought if LECs were to be included in some way. For instance, as currently drafted the rule would define a local exchange company as both a call aggregator and an alternative operator service company--thus subjecting the company to all requirements for both. This would simply not make sense from a public policy or business point of view.

In conclusion, United respectfully urges the Commission to adopt the proposed rules with the clarification that they do not apply to the operations of local exchange companies.

Respectfully submitted March 6, 1991, by



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Tim J. Bonansinga  
General Counsel