

Dear Commissioners:

Re: UT 030939

We understand that Qwest has filed a petition with the Commission to be exempted from the requirements of WAC 480-120-104 when providing a business customer initiating service with 6 telephone lines or more from Qwest having to provide an order confirmation letter in writing or electronically if acceptable to the customer.

We, the Independent Business Association, oppose the Qwest petition for the following reasons:

The US Small Business Administration defines a small business as a business with 500 to 1000 or fewer employees in many industries. See attachment [SBAdefinition.pdf](#). Small businesses are defined by Washington State law as businesses with 50 or fewer employees by RCW 19.85.020(1). See attachment [WAdefinition.pdf](#). This has been the historic definition of small businesses in Washington State since the mid 1970's. Depending on the industry, many small businesses will have far more than 6 telephone lines. In many industries such as real estate, sales organizations, insurance industry, etc. a small businesses may have 20 or more telephone lines if they have 50 employees. The Qwest petition defines a large business as having 6 lines. This is clearly not supported by the definition of small business in federal or state law.

Given the extremely difficult challenges of operating a small business in this modern economy, there are no justifications we can think of for Qwest to not provide this written order confirmation. The written order confirmation will:

Reduce order mistakes between Qwest and small business which will reduce costs for both Qwest and its small business customers.

Small business owners are not telecommunications experts. They are far more like a residential consumer than a large business telephone consumer who will have telecommunications experts on staff or on a consulting basis to set up their telecommunications system. Small business owners will seldom have such telecommunications expertise available to them.

The cost for each business telephone line is about twice the cost of each residential telephone line and with multiple line orders from a single small business, the cost of providing the written order confirmation letter is a far lower cost incrementally to Qwest in providing this letter to a business that may order 25 lines of service as compared to the cost to Qwest to provide this letter to a residential customer ordering one line of service. For example, the cost of providing this letter to a small business ordering 10 lines of service would be 5% of the cost of providing the same letter to a residential customer ordering a single line of service as compared to their monthly service costs, or a 95% reduction in cost as compared to monthly telephone service charges.

For the reasons stated above, the Independent Business Association also opposes the staff recommendation to the Commission on UT 030939.

The Independent Business Association would only accept the exemption requested by Qwest for orders of twenty-five (25) or more telephone lines by a business customer.

Respectfully submitted,

Gary Smith
Executive Director
Independent Business Association