

Agenda Date: June 26, 2008  
Item Number: A1

**Docket:** UT-080468  
**Company:** Qwest Corporation

**Staff:** John Cupp, Regulatory Analyst  
Will Saunders, Assistant Director, Telecommunications  
Kristen Russell, Regulatory Analyst

### **Recommendation**

Grant Qwest's request for exemption from WAC 480-120-161, subsections (4)(b)-(e), and (5)(a) and (b) insofar as these subsections apply to customers voluntarily requesting a summary bill, on the condition that the company meet the reporting requirement as described by staff, allow summary bill customers a one-time waiver of the duplicate bill charge, and not charge customers to switch to or from the summary bill program.

### **Discussion**

On March 12, 2008, Qwest Corporation filed a petition requesting exemption from certain provisions of WAC 480-120-161 regarding customer bill format and content, in particular subsections (4)(b)-(e), (5)(a)-(b). Subsections (4)(b)-(e) address the level of detail that must be included with regard to third party service providers and subsections (5)(a) and (b) address the descriptions of billed charges.

Qwest represents that its summary bill will:

- show charges from third parties,
- group services by type,
- show an aggregate amount due for long distance calls,
- summarize information about taxes and surcharges, and
- provide billing totals for each class of service a customer purchases.

The summary bill will not:

- show a breakdown of charges from each third party,
- itemize all services provided, or
- show long distance call details on a call-by-call basis.

Qwest's proposal is similar to a filing made by United Telephone Company of the Northwest, d/b/a Embarq (Embarq) in 2007 in Docket UT-071158, in which the commission granted Embarq an exemption from portions of WAC 480-120-161, allowing the company to implement a summary bill program.

Similar to the Embarq program, Qwest customers can switch to or from the summary bill program at any time without charge.

Qwest's similar bill format, but there are differences between Qwest's and Embarq's billing practices that make the companies' situations different.

Qwest customers are currently subject to a \$5 charge for copies of paper bills older than six months. Electronic copies are available for 12 months. As it seems more likely that a summary bill customer will require a bill copy, staff recommends at a minimum that the company be required to allow those customers a one-time waiver of the charge for reprinting archived bills. Customers are free to change back to detailed billing at any time, but if they stay on the summary bill program and need another reprint, they could be charged, the same as other Qwest customers. Embarq does not charge for reprints, but Qwest's reprint charge has been in place for some time without customer complaints. Under Qwest's standard account management practices customers also have free access on Qwest's website to their full bill detail on-line for up to 12 months of previous billing. This free web service could help customers who anticipate a need for reprints.

Staff recommends that Qwest be required provide a report to staff six months after implementing the program, and another six months later. The company will provide the following information in a month-by-month breakdown:

- The number of customers eligible for the summary bill program.
- The number of customers enrolled in the program.
- The number of customers who opted out of the program.

Consumer Protection staff will provide complaint data for the same 6-month reporting periods. Staff will review the reports at the end of the first year and if necessary recommend an extension of the reporting requirement.

Public Counsel has been involved in discussions with the company, and supports staff's recommendation.

### **Conclusion**

Based on staff's analysis of Qwest's petition and the company's responses to staff's inquiries, staff recommends the commission grant Qwest's request for exemption from WAC 480-120-161, subsections (4)(b)-(e) and (5)(a)-(b), on the condition that the company meet the reporting requirement described, allow summary bill customers a one-time waiver of the duplicate bill charge, and commit not to charge customers to switch to or from the summary bill program. With these conditions staff believes the program will benefit consumers who prefer a less complex bill.

Attachments:

- sample summary bill (Attachment A)
- sample detailed bill (Attachment B)