

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

Rules relating to Commission	)	
General – Tariffs; chapter	)	<b>UT-991301</b>
480-80 WAC	)	

**COMMENTS OF SPRINT COMMUNICATIONS COMPANY, L.P.**

Sprint Communications Company, L.P. (“Sprint”) submits these further comments regarding tariff rule revisions and the proposed price list and contract rules in Attachment B to the October 2, 2000, Notice of Opportunity to File Written Comments in this docket.

**Proposals Concerning Electronic Filing, Other Tariff Rules**

Sprint enthusiastically supports the staff’s initiative to move toward an electronic tariff filing process. The Federal Communications Commission’s (FCC’s) Electronic Tariff Filing System has been working well, using a Commission-secure website with a log-on that requires a password. We support the idea of the WUTC instituting a similar process for state tariff filings. We propose that only the affected pages of the tariff being changed would be filed, rather than re-filing complete sections or the entire document each time, and that the best filing format would be Portable Document Format (pdf), with options to use Word or WordPerfect formats where Adobe Acrobat Writer software is not available.

Sprint itself has been moving toward electronic filing as much as possible in those states where we provide local exchange telephone service. In addition, as part of our effort to maximize use of the Internet, Sprint currently makes available on our website

copies of pending and approved tariff filings as well as our complete tariffs. The website address is [www.sprint.com/tariffs](http://www.sprint.com/tariffs).

We recommend elimination of the signature requirement on individual tariff pages or, if that cannot be accomplished, electronic signatures for tariff pages and transmittal letters.

For tracking, Sprint supports using either the docket number or a tariff control number as is currently done in the paper process.

Sprint's preference on tariff symbols is to retain most of the ones currently used because they are consistent with other states throughout our nationwide serving area. We suggest only that the "K" symbol for "moved to" be eliminated and the "M" be retained to mean "moved."

We support eliminating paper copies in business offices. Our tariffs are available on our website and electronic access can also be made available through business offices.

### **Proposed Price List, Contract Rules**

Sprint stands by its arguments in the initial round of comments that any filing requirement, other than the statutory obligation to file a price list, should be eliminated for CLECs.

Further, we agree with the suggestion made by Qwest at the November 14 workshop that contracts for competitive services be filed within fifteen business days of their effective date rather than five days as currently proposed.

Respectfully submitted this 11<sup>th</sup> day of December, 2000

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Nancy L. Judy  
State Executive – Oregon & Washington