

November 28, 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**

Verizon Northwest Inc. and Verizon Select Services Inc. ("Verizon") appreciate the revisions in proposed Chapter 480-121 WAC, WAC 480-120-052 and WAC 480-120-058 that were issued on November 8, 2001.

There appears to be an inconsistency in the draft rules with regard to the review and approval of registration applications. Verizon does not propose any specific solution, but points it out so the Commission can decide whether it needs to be addressed. Rule 480-121-020(3) provides that the Commission may require applicants to show (a) adequate financial resources, (b) technical competence, and (c) compliance with various legal requirements. Likewise, rule 480-120-040(2) provides that the Commission may deny a registration application for failure to possess adequate financial resources and/or technical competence. Yet, rule 480-121-040(1) allows the Commission's Secretary to grant applications where a Commission application form is used and six items of information are provided. None of these six items expressly covers technical competence or compliance with legal requirements, and the balance sheet and annual report may or may not show adequate financial resources for the proposed new Washington operation.

Verizon has one minor suggestion for proposed 480-121-060. Subsection (2) should be deleted. The requirement to comply with federal, state and local technical regulations is included in subsection (1)(e).

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

Very truly yours,

Lida C. Tong  
Director – Regulatory & Government Affairs