

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In re: Telecommunications Rulemaking)	
)	
Consumer Rules: WAC 480-120-041, 042,)	
045, 052, 056, 057, 061, 081, 087, 088, 089, 101,)	Docket No. UT990146
106, 116, 121, 138, 141, 144, X07.)	
)	
)	
)	

COMMENTS OF WORLDCOM, INC.

WorldCom, Inc. (WCOM), formerly known as MCI WorldCom, Inc. submits its comments on the Consumer Rules section.

Introduction

WCOM appreciates the work and effort of the Washington Utilities and Transportation Commission (WUTC) and all of the workshop participants on all their efforts in revising the Telecom Rules. It is, however, still evident that distinctions need to be made in the rules for CLECs and rules for ILECs. Many of the issues discussed in the stakeholder workshops on various issues including, but not limited to, discontinuance of service, notification, availability of service, do not fit in today's competitive environment. The WUTC is trying to force a square piece into a round hole, which will eventually force competitive carriers to decrease service to the state.

Similarly, distinctions need to be made in the rules between rules for business services and residential services. Consumer protections that may make sense for residential customers don't always translate to the business environment. Business

customers are generally served by dedicated account teams versus customer service representatives. Due to the complexity of the business customers' requirements, business customers have a different, and often more regular, relationship with the company providing their telecommunications needs. These customers are served via general business contracts, and are therefore kept informed of their rights and responsibilities through the contracts, sales information and direct contact.

Unless specifically stated, business services served by a competitive local carrier should be exempt from the provisions in WAC 480-120-041, 042, 045, 052, 056, 057, 061, 081, 087, 088, 089, 101, 106, 116, 121, 138, 141, 144, X07.

480-120-041 Availability of Information

The current rule is sufficient and should remain and should not change. It is neither cost effective for carriers nor helpful to consumer to receive unsolicited material. Residential customers can obtain any needed information merely by calling their carrier (who's toll free number is usually noted on each invoice) to request any information included on a brochure (or otherwise). In the alternative, it is more effective to publish this information to consumers generally in directories or on internet websites. Further information can be obtained by requesting the information over the telephone. Carriers already include much of this type of information in "welcome packages" for new customers as mandated by Federal Law. For carriers operating in multiple states, this requirement is overburdensome and forces carriers to make special arrangements for Washington customers, which will be costly.

Regarding internet websites or electronic means for notification, national carriers

are faced with the same issues as above. It is not feasible to incorporate each states' consumer education rules on a website; however, it would be much more efficient to incorporate Federal requirements required in all states along with a telephone number to call and request specific information.

Directory Service

It is reasonable for customers to receive free intercept service for 30 days; however, intercept service after after 30 days, assuming this is technically feasible, should be paid for by the customer. In cases where a directory listing is incorrect or inadvertently omitted from the directory, it is reasonable that the customer be reimbursed for any fees associated with directory listings until a new directory is listed.

WAC 480-120-056 Establishment of Credit

Competitive carriers should be left to decide what constitutes satisfactory credit in any environment whether it is business or residential. Credit agency reports and other means by which to obtain financial status should be left to the discretion of the carriers in order to use the most cost efficient method to establish a non-discriminatory practice of securing reasonable and satisfactory credit.

WAC 480-120-057 Deposit or Security - Resellers

This is a carrier-to-carrier issue and is handled through contractual agreements between carriers. The WUTC would not be fulfilling its goal in protecting end users from resellers who discontinue serving customers by placing regulations on business practices between carriers. This rule is unnecessary and should be deleted.

WAC 480-120-081 – Discontinuance of Service

Section 1:

Competitive local carriers need more than one day, or at times, more than one business day to complete a disconnect order by the customer. If portions of the network are dependant on another carrier in order to perform the disconnect, one day may not be enough time. The rule should be restricted to residential service and should allow for time needed for special circumstances.

Section 7(c):

This section should be removed in its entirety. Carriers should be under no obligation to notify twice that service is going to be disconnected. Customers receive a payment due date with their bill first. When a bill is delinquent, a disconnection notice is sent. Any further regulatory notices adds administrative burdens as well as production cost to the carriers, especially smaller, competitive carriers. Some carriers may very well have internal processes set up to notify a second time, but this process should not be regulated. The public interest is not served by protecting customers who do not pay bills on time.

WAC 480-120-101 Complaints and Disputes

Responding to complaints from the WUTC within 2 days is overly burdensome and should be extended to a minimum of 5 business days. Competitive carriers operating in multiple states may not have sufficient staff to accommodate this rule and have to shuffle other states' deadlines (which are longer) to meet this short turn-around. Also, five days would carriers to respond more thoroughly and consistently meet time requirements without having to ask for more time or need to follow-up.

Use of Common Company Names, Logo's, Billings Statements, Etc.

This should be taken care of in the slamming rules. Staff did not use any

examples of this issue that did not relate to the initiation of service. When a customer receives their initial bill, they should then be informed of who their carrier is. If the carrier had changed to a company with a similar name, it is the responsibility of the customer to identify that the change was valid, whether the name of the company is similar or not.

Submitted this 12th day of May, 2000.

MCI WorldCom, Inc.

Joan M. Stout
Manager, Regulatory Compliance
201 Spear St.
San Francisco, CA 94105
415-228-1133