

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

In regards to: EMERGENCY RULE) DOCKET NO. UT-030860
REGARDING THE WASHINGTON)
TELEPHONE ASSISTANCE) COMMENTS OF CITIZENS' UTILITY
PROGRAM and changing the effective) ALLIANCE OF WASHINGTON a
date of WAC 480-120-174) program of SPOKANE
) NEIGHBORHOOD ACTION
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The Citizens' Utility Alliance of Washington (CUA) a program of Spokane Neighborhood Action Programs (SNAP) respectfully submits these comments regarding an emergency rule that would change the effective date of WAC 480-120-174. CUA thanks the Commission for this opportunity to comment.

CUA strongly endorses moving up the effective date of WAC 480-120-174. The Commission is aware of the possibility, because of an emergency DSHS rule, that one or more phone companies may disconnect many thousands of current Washington Telephone Assistance Program Participants. Moving up the effective date of the rule will help many households stay connected to basic phone service.

It is the first hand experience of CUA and SNAP's Low Income Telecom Project, from helping hundreds of people one-on-one to enroll in WTAP, that the major barrier to low-income households obtaining basic phone service and enrolling in WTAP are prior obligations owed to the Incumbent Local Exchange Carriers. The phone service providers that are affected by the DSHS emergency rule were able to profit from this situation by offering phone service to households

with prior obligations owed to the ILECs. If the phone service providers affected by the DSHS rule disconnect WTAP customers, our experience indicates that the vast majority of those who are disconnected will face the barrier of prior obligations owed to the ILECs.

Therefore, we see earlier implementation of WAC 480-120-174 as essential to preventing many people from losing, or having a gap in, their phone service. The earlier the rule goes into effect the earlier households can make arrangements to prevent disruptions in their service and the earlier low income service providers, like SNAP, can begin to assist households in the transition to another phone service provider.

Disconnection will have serious consequences. First, disconnection has a cruel effect on the health and safety of many households. Many households rely on WTAP and local phone service for access to medical providers and emergency medical services. Elderly, disabled, rural, or low-income households, with no public or private transportation depend on basic phone service as their lifeline. Domestic violence and other crime victims, often trapped by circumstances or in crime infested neighborhoods, need basic phone service to access law-enforcement. Parents need a way for their children, caregivers or schools to contact them in case of emergency.

Second, a disruption in basic phone service can have serious economic consequences for a household. Employers no longer have a number to call to prospective employees. A disconnection recording with no forwarding number all but guarantees a lost employment opportunity.

Finally, having basic phone service is also essential for those trying to access housing, childcare, job training, or social services. The sudden loss of phone service can not only prevent a household from gaining access to these essential support services, but also disrupts progress made in improving a household's overall well-being. Households teetering on the edge of self-sufficiency can fall back.

Accordingly, with all these reasons in mind, we respectfully ask the Commission to advance the effective date of WAC 480-120-174.

Respectfully submitted this 6th day of June, 2003.

John O'Rourke
Attorney, Citizens' Utility Alliance of Washington
Spokane Neighborhood Action Programs
212 W. 2nd Avenue
Spokane, WA 99201
(509) 744-3370, Ext 24
orourke@snapwa.org