

May 15, 2006

VIA ELECTRONIC TRANSMISSION

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Ms. Carole J. Washburn, Executive Secretary

Washington Utilities and Transportation Commission

1300 South Evergreen Park Drive S.W.

Olympia, Washington 98504-7250

Re: Rulemaking to Consider Price List Elimination, Docket No. UT - 060676

Dear Executive Secretary Washburn:

Please find transmitted herein on behalf of Trans National Communications International, Inc. ("TNCI") comments in the above-referenced Washington Utilities and Transportation Commission's ("WUTC") proceeding to discuss implementation of recent changes to State of Washington Law (chapter 347, Laws of 2006 (SSB 6473)) ("Law") which eliminate the use of price lists for competitive telecommunications services.

Overview

TNCI understands the Law includes the following changes:

- Instead of using price lists, companies will communicate with customers directly using a written contract or customer service agreement.
- Companies will be required to withdraw existing price lists, and give customers information about ongoing rates, terms and conditions.
- The new law will not affect tariffs or regulatory fees ("Fees").
- Companies will still be required to continue working with Commission Staff on consumer complaints.

TNCI's Position

TNCI generally supports the Law and the WUTC's plans for implementation; however, TNCI respectfully submits the following points:

- Regarding competitive providers' obligations to remit Fees for general operations of the WUTC, TNCI respectfully submits that a commensurate lowering of Fees proportionate to reductions in the WUTC's operational costs related to price list acceptance and maintenance is reasonable and as such, represents the most proper course-of-action for the Commission.
- Regarding the continuing obligation to file intrastate tariffs with the WUTC, TNCI requests clarification as to which services and products must be contained in filed and effective tariffs at the Commission.

Conclusion

TNCI generally supports the WUTCs implementation plans of the above-noted Law and wishes only to offer the following points. First, TNCI respectfully submits that a reduction of Fees commensurate with reductions in the WUTC's operational costs related to price list acceptance and maintenance is a reasonable action that should emanate from Docket No.UT-060676. Second, TNCI requests clarification about which products and services are required to be contained in tariffs as condition(s) of compliance with State of Washington Rule(s) and / or Law(s).

TNCI sincerely appreciates the opportunity to file comments in the above-referenced Docket. Please direct any questions regarding this filing to the attention of the undersigned at (617) 369-1163 or via email at cnance@tncii.com.

Respectfully submitted,

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cc: WUTC (via First Class U. S. Mail)
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