

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

RULEMAKING TO CONSIDER REVISIONS) DOCKET NO. UT-100148
TO WAC 480-120-264(5)(a) PREPAID CALLING)
[CARD] SERVICES)

COMMENTS

MCI Communications Services Inc. d/b/a Verizon Business Services (“Verizon”) submits these comments in response to the Notice of Opportunity to File Written Comments issued by the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) on February 19, 2010.

Verizon recommends that the Commission amend proposed subsection WAC 480-120-264(5)(a)(viii) to read as follows:

The number of minutes contained on the card, OR THE VALUE OF THE CARD AND RATES FROM WHICH SUCH MINUTES MAY BE DETERMINED, must be disclosed on the card or packaging.

This amendment is necessary because not all prepaid calling cards contain a fixed number of minutes; instead, certain cards state a particular total value that, for convenience to customers, can be used for different types of calls that have different rates (thus rendering a total minute disclosure impossible).

Such prepaid calling cards are offered as a convenience for callers with divergent calling needs. Certain customers may use calling cards for domestic calling, others place international calls to one or more foreign countries, and some use cards for both domestic and international calls. The proposed Commission rule would do away with this convenience by inappropriately focusing on a disclosure requirement for total number of minutes. Since rates can vary for the different types of calls that a consumer might place,

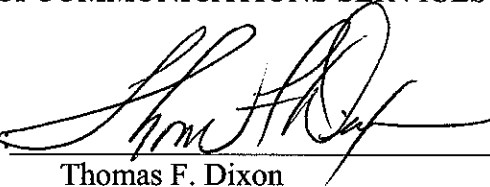
the total number of minutes of calling that may be made from a single card will differ depending on the types of calls made. It is not commercially practicable, nor convenient for prepaid calling customers, to create a different card for each possible call destination for which a card may be used.

Therefore, cards that provide a fixed value (but with myriad uses and rates) provide consumers the flexibility and choice to use the card for the calls that they choose to make. As long as relevant rates are made available, consumers can make informed decisions about the minutes of calling available on the cards they purchase. Therefore, permitting either the number of minutes or the value of the card and the rates to be charged will foster competition and provide more flexibility to customers.

For the above reasons, if the Commission moves ahead with its proposed rules, Verizon urges that it adopt the amendment proposed above.

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