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STATE OF WASH.  
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COMMISSION

**GTE Northwest Incorporated**

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Everett, Washington 98206-1003  
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March 26, 1991

Mr. Paul Curl, Secretary  
Washington Utilities and Transportation Commission  
Chandler Plaza Building  
1300 S. Evergreen Park Drive, SW  
P.O. Box 9022  
Olympia, Washington 98504

Dear Mr. Curl:

Subject: **UT-900726 PROPOSED WAC'S 480-120-121, -106, -138, and -141  
RELATING TO ALTERNATE OPERATOR SERVICES, PAY TELEPHONES,  
AND BILLS**

GTE Northwest Incorporated ("GTE Northwest") hereby briefly replies to the comments submitted by other interested parties in the above-entitled rulemaking docket. In particular, GTE Northwest would like to reiterate its strong opposition to inclusion of local exchange companies within the definition of Alternate Operator Service ("AOS") companies. Unless there is some compelling factual reason for including LEC's within these stringent proposed AOS rules (which is nonexistent), there is little policy rationale for such inclusion.

GTE Northwest otherwise supports the comments filed by U S WEST, Whidbey Telephone Company, United Telephone Company of the Northwest, and the Washington Independent Telephone Association ("WITA").

GTE Northwest applauds the Commission's efforts to protect Washington State consumers from some of the practices which have been the subject of consumer complaints over the recent years. However, it believes that the Commission would be over-reaching were it to extend the rule to include local exchange companies.

Sincerely,

*for* Fred E. Logan  
Director - Regulatory Affairs

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