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October 15, 1999

Carole J. Washburn, Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, Washington 98504-75250

RE: Chapter 480-80 WAC – Commission General – Tariffs  
Docket No. U-991301

Dear Ms. Washburn:

The Commission's letter dated September 14, 1999 requested written comments on essential related topics found in Chapter 480-80 WAC and Chapter 480-120 WAC. This request asked that companies focus their comments on rules currently found in 480-80 WAC that the Company believes should be in the regulated industry Chapter 480-120 WAC, as well as those rules currently found in Chapter 480-120 WAC that should be moved to the Tariff rules, 480-80 WAC.

WAC 480-120-027 addresses price lists while the entire Chapter 480-80 WAC addresses tariffs. Since the definition of price lists and tariffs are similar, both subjects should be incorporated under one rule. To do this, WAC 480-80-040 Tariffs and WAC 480-80-041 Tariffs could be combined and rewritten to include language found in WAC 480-120-027 Price lists. The title of Chapter 480-80 could then be entitled "Tariffs, Price Lists and Contracts".

However, since the Commission has requested that this proceeding focus only on rules that should be moved from one rule to the other, these comments will address only that. Following are U S WEST's initial comments in response to the Commission's request.

## CHAPTER 480-80 WAC TARIFFS

It is unclear as to why the following rule is found in Chapter 480-80 entitled "Utilities General – Tariffs" since it does not relate to the tariff rules. Therefore, the following rule should be moved to Chapter 480-120 WAC Telephone Companies:

WAC 480-80-049 Caller identification service.

This rule contains information and standards relating to caller identification blocking service. When this rule was written, caller identification service and the ability to display names, number or locations was essentially unknown by most customers. Since customers are now aware that this information is being transmitted, this rule is no longer necessary.

However, if the Commission decides that it is necessary it should be moved to Chapter 480-120 WAC since it does not fall under the definition of "tariff".

## CHAPTER 480-120 WAC TELEPHONE COMPANIES

U S WEST suggests that the commission move WAC 480-120-027 Price lists from Chapter 480-120 to Chapter 480-80 in its entirety. Changes to this rule can be made when the commission performs its comprehensive review of Chapter 480-80 WAC at a later date.

WAC 480-120-026 Tariffs and WAC 480-120-066 Contract for service contains language that is duplicated in the Tariff rules Chapter 480-80. Therefore, these rules should be deleted in their entirety:

Please call Holly Dean on 360-754-3241, if you have any questions.

Very truly yours,