



UNITED TELEPHONE COMPANY OF THE NORTHWEST
902 Wasco Street • Hood River, Oregon 97031

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STATE OF WASH.
UTIL. & TRANSP
COMMISSION

March 26, 1991

Mr. Paul Curl, Secretary
Washington Utilities and Transportation Commission
Box 9022
Olympia, WA 98504-9022

Members of the Commission:

Enclosed please find the reply comments of United Telephone Company of the Northwest in Docket No. UT-900726.

If you have any questions or comments, please feel free to contact me at the address above or by calling (503) 387-9290.

Sincerely,

A handwritten signature in cursive script that reads "Glenn Harris".

Glenn Harris
Regulatory Relations Administrator

:egh

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3 BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

4 UT-900726

5 In the Matter of Proposed Amendments)
6 to WAC 480-120-021, -106, -138, and)
7 -141 Relating to Glossary, Alternate)
Operator Services, Pay Telephones,)
and Form of Bills)

REPLY COMMENTS OF UNITED TELEPHONE
COMPANY OF THE NORTHWEST

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9 United Telephone Company of the Northwest has had the opportunity to
10 review the comments submitted in this docket and offers the following brief
11 comments in reply.

12 United supports the comments of GTE Northwest Incorporated pointing out
13 that Chapter 247, Laws of 1990, was not intended to regulate local exchange
14 companies (LECs) providing operator services in connection with its normal
15 business activities.

16 The comments of others relating to the creation of a "level playing
17 field" by including LECs in this proposed rule totally ignore all the
18 arguments to the contrary offered in the first round of comments by GTE
19 Northwest Incorporated, United, U.S. West Communications, and Whidbey
20 Telephone Company. Alternative operator service providers do not have broad
21 territorial responsibilities and are not the providers of last resort; LECs do
22 and are. The AOS companies and call aggregators have already taken many of
23 the most lucrative locations in the state and show no inclination to locate in
24 less lucrative areas that must have service. If LECs are included in this
25 rule, the "playing field" would actually become less level, not more so; it
26 would be even easier for the alternative providers to focus on the best
27

1 | locations.

2 | United does agree with most commenters that the specific branding
3 | language contained in the proposed rule, WAC 480-12--141 (5) (a) (ii) should
4 | not be included. While not opposed to branding, United believes there should
5 | be more flexibility in the branding frequency and techniques allowed.

6 | United also would echo the comments of U.S. West that there is no reason
7 | for this rule to contain higher standards for service levels than those
8 | traditionally imposed on the LECs--and would note further that, were LECs to
9 | be included, the proposed standards in the rule would be a burdensome change
10 | from B.01 for busy hour over twenty consecutive days. We agree also with U.S.
11 | West's comment that the rule should not require specific dialing instructions
12 | for reaching a preferred carrier.

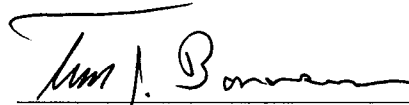
13 | Finally, United is concerned with the question of who is going to police
14 | this proposed rule assuming that, as it should, it applies only to alternative
15 | providers. We have already experienced demands from Commission staff that our
16 | people tour COCOT locations periodically to see if the Commission's current
17 | posting rules are being followed. It would be extremely burdensome--and
18 | detrimental to the ratepayer--to commit the manpower and time required to
19 | administer this rule, which would involve not only inspections but periodic
20 | testing and measurements, etc.

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1 In conclusion, United urges the Commission to adopt the bulk of the rule
2 with the modifications noted above, excluding LECs, and with assurances that
3 the LECs will not be required to commit significant resources to ensuring that
4 alternative providers conform.

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7 Respectfully submitted March 27, 1991 by



Tim J. Bonansinga, General Counsel

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