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April 4, 1991

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STATE OF WASH.
UTIL. & TRANSP.
COMMISSION

Paul Curl, Secretary
Utilities & Transportation Commission
13005 Evergreen Park Dr. SW
Olympia, WA 98504

RE: Proposed Rules--WSR 91-03-122

Dear Mr Curl:

I am a consumer of pay telephone services. I have a few concerns about the necessity for regulation of providers which may not be adequately covered by your proposed regulations.

One of the areas which I believe your regulations do not address is the necessity for providing a minimal level of technological capacity to warrant collecting a fee. With the advent of voice mail systems at most businesses, pay phones need to at least be able to transmit the necessary tones at a speed which FCC approved PBX and voice mail systems require for operation. Some of the phones, such as FoneAmerica, may connect, but are so slow or otherwise inadequate that they cannot activate PBX systems operating pursuant to FCC standards. If I try to call my PBX, and have to pay for the call, I should at least be able to access all FCC approved systems. If the pay phone can't meet the minimums, it should not be able to operate and collect access charges for service it cannot render.

Another concern that I have is that many pay phone companies make no attempt to have the relevant phone books available. Your regulations should require them to do so. I realize that books can be stolen, but they should at least make reasonable attempts to maintain books. I have had to make repeated Directory Assistance calls at inflated rates just to make local calls. Please set a minimum standard of performance as a condition to placement of a pay phone.

I have also experienced extremely slow service at some pay phones, just to get an operator from another state. In some cases this has been more than 5 minutes. I believe that your regulations should protect consumers by requiring at least a minimal routine service level, in exchange for collecting access fees.

The remainder of my comments may be addressed by your regulations, but I want to share them with you. I believe it essential that rate regulation is required. I have had to pay 2-5 times the normal carrier charges just to make a call. Since

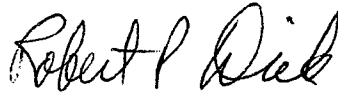
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these phones are often the "only game in town," I believe that limits should be placed on their charges. If you determine that varied pricing is appropriate, then posting at the machine of the charges required, should at least be required. This doesn't cure the monopoly problem, but at least it keeps the unwary from being trapped without any indication that an unreasonable fee is being charged. I applaud your prohibition of "blocking" access to other carriers. I have often used phones which simply would not allow me access to a preferred carrier. I hope that interpretation of your regulations will require pay phone providers to always allow access to other cheaper or customer preferred carriers at a limited fee, such as \$.25.

Thank you for addressing this serious consumer protection problem.

Sincerely,



Telephone: 591-6514

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