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June 30, 2006

**VIA EMAIL**

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

**Re: Docket No. UT-060676 – Comments of Verizon Northwest Inc.**

Dear Ms. Washburn:

Pursuant to the Commission's May 5, 2006 Notice of Opportunity to File Written Comments, Verizon Northwest Inc. ("Verizon") provides the following comments regarding the development of rules to implement SSB 6473.

SSB 6473 was enacted to eliminate filing requirements associated with competitive companies and services. As a result, the only rule change necessary to implement the legislation is elimination of the regulatory requirements previously associated with filing price lists at the Commission. The Commission should not promulgate rules that merely restate the statute or supplement the statute with additional requirements. For example, although the CR-101 issued in this docket contemplates the need to develop rules that "govern waivers," such rules are unnecessary. The statute clearly indicates that the Commission should evaluate waiver requests based on two factors: (1) whether the petitioning company demonstrates it cannot reasonably implement a replacement for its price list by June 7, 2007, and (2) whether the extension of time will result in harm to customers or competition.

Similarly, there is no need to develop rules governing the written contracts or customer service agreements that will be used in place of the price lists. The statute sets out specific requirements for customer notification of the price list withdrawal and changes to the affected rates and services, leaving flexibility for carriers to determine the most appropriate method to implement such agreements and changes.

The only additional rules that should be contemplated would simply seek to provide clarification where the statute was silent. For instance, Section 6 of the law requires a 30 day notice period. It would prevent uncertainty if the Commission would issue a rule defining when the notice is deemed given. Verizon recommends that the approach of WAC 480-120-196 (Customer notice requirements – competitively classified telecommunications companies or services) be used; *i.e.*, that the notice be deemed given when mailed, appears in a newspaper or is posted on the company's website.

Verizon appreciates the opportunity to comment on this matter and looks forward to working with the Commission and industry on this docket.

Sincerely,

/s/

Robert A. Millar