

Agenda Date: March 12, 2003

Item Number: A2

Docket: UT-030263

Company Name: Qwest Corporation

Staff: Betty Erdahl, Regulatory Analyst
David Dittmore, Telecommunications Engineer
Bob Williamson, Telecommunications Engineer

Recommendation:

Allow the tariff filing in Docket No. UT-030263 to go into effect with less than statutory notice.

Background

Qwest Corporation (Qwest) made a filing on February 25, 2003 for the use of codes 211, 311, 511 and 711 (as a group, N11 services) proposing terms, conditions and rates. The Federal Communications Commission (FCC) in CC Docket 92-105, specified the assignment of codes 211, 311, 511 and 711 to facilitate network access to various types of information of interest to the public.

The abbreviated dialing codes designated by the FCC are:

- 711 – Access to the telecommunications relay service for the speech and hearing impaired. It was implemented on October 21, 2001.
- 511 – Access to information relating to road and traffic conditions.
- 211 -- Public, health, and community services.
- 311 -- Non-emergency police, fire, and municipal business.

Qwest originally filed a tariff to provide N11 services on June 11, 2001. Staff expressed concerns about a provision in the tariff to charge for each N11 call received by a entity using an abbreviated dialing code. Qwest withdrew that filing. It nonetheless made the required switch translations to implement 711, as did other local telephone companies in Washington State.

More recently, Qwest filed a contract in Docket UT-030081 to provide 511 service. In this state 511 service will be used by the Washington Department of Transportation. DOT currently has a touch-tone telephone statewide travel information system. DOT will use 511 in place of existing traffic information numbers, including (206) 368-4499

(DOT-HIWY), 1-800-695-7623 (ROAD), and 1-800-84FERRY. DOT expects introduction of the 511 dialing pattern to increase the number of calls it receives from 387,000 per month to 541,800 per month.¹

Staff raised several concerns with the 511 contract, including its designation as confidential, the specific rates proposed, and the general practice of using contracts rather than tariffs to provide N11 services. Qwest withdrew the contract February 19, 2003, and filed the N11 tariff on February 25, 2003.

Other local exchange companies appear to be implementing 511 without filing a tariff or contract to recover implementation costs. While Qwest has not taken this approach, it has proposed rates that reasonably reflect the costs of setting up the N11 dialing arrangements. Qwest did not propose a per call rate in this filing. The proposed rates are \$199.00 to set up or change the point-to number of a subscriber (the number(s) to which all calls of a particular N11 code are routed) and a per switch charge of \$22.25 for the initial set up of an N11 code. Once the switch is set up to direct an N11 call to a certain point-to, additional switch work is not needed to change the point-to number.

The company filed with less than statutory notice in order to get the tariff in place quickly because 511 is being implemented as soon as possible.

Summary

Staff recommends the Commission allow the tariff filing to go into effect with less than statutory notice effective March 13, 2003.

¹ The DOT's 511 program is described at www.wsdot.wa.gov/traffic/511/.