

Commission complaint records do not indicate any confusion on the part of Tel West staff when violations of WAC 480-120-147 were assessed in the following complaints:

Complaint	Information Provided by Staff Regarding Violation	Tel West's Response
85015	Consumer Affairs staff John Cupp emailed company representative Don Taylor on September 2, 2003. The email stated, in part, "Please be informed that a local service freeze may not be added to an account in Washington without an order from the customer... I have noted violations of this WAC. Please let me know if you have questions or comments."	Company did not question or dispute violation.
84496	Consumer Affairs staff Roger Kouchi emailed company representative Chris Sturgul on October 2, 2003. The email stated, in part, "WAC 480-120-147(5) requires documentation of a PIC freeze on a consumer's account. Please provide the required documentation (i.e. LOA, 3 rd party verification, or electronic verification." (The entire text of WAC 480-120-147 was provided to Tel West.)	Mr. Sturgul responded by email on November 5, 2003, stating, "We do not have any documentation regarding the LEC freeze authorization."
84532	Consumer Affairs staff Sheri Hoyt emailed company representatives Chris Sturgul and Don Taylor on October 17, 2003. The email stated, in part, "WAC 480-120-147(5) refers to Preferred carrier freezes. As you know, all local exchange companies (LECs) must offer preferred carrier freezes. Offers or solicitations for freezes must clearly distinguish among telecommunications services subject to a freeze (e.g., local exchange, intraLATA toll, and interLATA toll). The LEC must obtain separate authorization for each service for which a preferred carrier freeze is requested...no LEC may implement a ...freeze unless the customer's request to impose a freeze has...been confirmed... I am requesting that Tel West provide me proof of authorization of the freeze that was placed on this customer's service. Please let me know if you have any questions."	Mr. Sturgul responded by email on November 5, 2003, stating, "We don't have any record of this customer authorization."
86385	Consumer Affairs staff Mike Meeks emailed company representative Don Taylor on December 4, 2003. The email stated, "Please provide a letter of agency or a third party verification of the customer's request for a local carrier freeze per WAC 480-120-147(5)(c)."	Mr. Taylor responded by email on December 4, 2003, stating, "Tel West is updating its Third Party Verification process to include the customer's understanding that a local service freeze will be placed upon the line as part of the conversion to Tel West's service, and that the freeze can be removed upon request at any time by the customer. However, Tel West has no documentation

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		regarding the local service freeze on this particular customer's account."
86836	Consumer Affairs staff Roger Kouchi emailed company representatives Mat Myers and Don Taylor on January 8, 2004. The email stated, in part, "Still need documentation on the PIC freeze authorization by Tel West..."	Mr. Myers responded by email on January 8, 2004, stating, "This was a customer who had signed up prior to TelWest (sic) updating their Verification process adding the PIC Freeze acknowledgement."
86904	Consumer Affairs staff Roger Kouchi emailed company representatives Mat Myers and Don Taylor on January 20, 2004. The email stated, in part, "Please provide the required documentation for the PIC freeze to Tel West." (The text of WAC 480-120-147(5) was provided to Tel West.)	Mr. Myers responded by email on January 20, 2004, stating, "This customer signed up before Telwest (sic) had made the addition to it's TPV script informing the customer of the PIC Freeze. The PIC freeze was mistakenly added to this customers account by order typist."
87032	Consumer Affairs staff Roger Kouchi emailed company representatives Mat Myers and Don Taylor on January 20, 2004. The email stated, in part, "...please provide the documentation that shows the consumer agreed to the PIC freeze to Tel West." (The text of WAC 480-120-147(5)(c) was provided to Tel West.)	Mr. Myers responded by email on January 20, 2004, stating, "This customer was signed up for service prior to our TPV script being updated to add the acknowledgement of the PIC freeze."
84971	Consumer Affairs staff Gail Griffin-Wallace emailed company representative Chris Sturgul on January 23, 2004. The email stated, in part, "WAC 480-120-147(5) says that express consent must be given by the customer...if the customer had a local freeze, how was the request received? Please provide a copy."	Mr. Sturgul responded by email on January 26, 2004, stating, "We do not have documentation for this request from the customer."
87487	Consumer Affairs staff Lori Kanz emailed company representative Mat Myers on February 6, 2004. The email stated, in part, "I will still need a copy of the carrier freeze TPV before I close the complaint." (The entire text of WAC 480-120-147 was provided to Tel West.)	Mr. Myers replied by email on February 6, 2004, stating, "I do not have a copy of the carrier freeze notification. When (customer) signed up, we had not added the notification to the TPV yet, and was added about two weeks after (customer) signed up. We have no signed paper explaining the freeze, just a note on the account that it was explained."

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87474	Consumer Affairs staff Gail Griffin-Wallace passed the complaint to the company on January 30, 2004. The initial complaint stated, in part, "WAC 480-120-147 requires express consent from the customer before a freeze is placed. Provide method of obtaining freeze from customer and provide copy."	Mr. Myers responded by email on February 11, 2004, stating, "Tel West does not have a copy of the customer's agreeing to the line freeze on file."
87687	Consumer Affairs staff Sheri Hoyt passed the complaint to the company on February 11, 2004. The initial complaint stated, in part, "Please provide the verification recording for the LEC freeze."	Mr. Myers responded by email on February 11, 2004, stating, "We do not have copy of authorization of the line freeze on this account."
87717	Consumer Affairs staff Sheri Hoyt passed the complaint to the company on February 12, 2004. The initial complaint stated, in part, "Please provide the TPV for the LEC freeze on this account."	Mr. Myers responded by email on February 12, 2004, stating, "Tel West does not have a copy of the notification of the line freeze."
87418	<p>Consumer Affairs staff Roger Kouchi emailed company representative Mat Myers on February 13, 2004. The email stated, in part, "I have recorded a violation of WAC 480-120-147(5) for the company's failure to get specific authorization for the PIC line freeze placed on this consumer's account." (The text of WAC 480-120-147(5)(c) was provided to Tel West.)</p> <p>Mr. Kouchi responded to Mr. Taylor by email on February 13, 2004, stating, "The rules requires that the company get the permission (customer must say YES or NO) to put the PIC line freeze on. The verification company simply stated that: for your protection, we will be placing a PIC line freeze on your account. The consumer did NOT specifically authorize it."</p>	<p>Mr. Taylor responded on February 13, 2004, stating, "Please explain why you are recording a violation of WAC 480-120-147(5)(c) on this complaint. I've reviewed the TPV and it is clearly explained to the customer that a freeze will be placed on the line for the customer's protection..."</p> <p>Mr. Taylor responded by email on February 13, 2004, stating: "I am advising Tel West to revise its TPV script to solicit a positive response from the customer regarding the freeze."</p>
87667	Consumer Affairs staff Sheri Hoyt emailed company representative Mat Myers on February 24, 2004. The email stated, in part, "I will be citing one violation of WAC 480-120-147(5). The WAC states, 'The carrier offering the freeze must obtain separate authorization for each service for which a preferred carrier freeze is requested.' During the TPV process...The customer was not allowed an opportunity to authorize or decline the LEC freeze – she was merely told it was being put on the service."	Company did not question the violation.
87696	Consumer Affairs staff Mike Meeks passed the complaint to the company on February 11, 2004. The initial complaint stated, in part, "Please provide the third	Mr. Myers responded with the TPV recording on February 12, 2004.

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	<p>party verification of local freeze.”</p> <p>Mr. Meeks responded to Mr. Myers on February 24, 2004, stating, “Everything about the TPV was proper with the exception of the procedure for implementing the local freeze. I am issuing a violation of WAC 480-120-147(5)(c).”</p>	<p>Company did not question or dispute violation.</p>

