

**UT-100148 Rulemaking
Comment Summary Matrix
March 25, 2010**

Section	Commenter	Comments	Staff Response
WAC 480-120-264(5)(a)	Thomas F. Dixon on behalf of <i>MCI Communications Services Inc. d/b/a Verizon Business Services</i> (“Verizon”)	<p>Verizon recommends that the Commission amend subsection WAC 480-120-264(5)(a)(viii), because not all prepaid calling cards contain a fixed number of minutes. Certain cards provide a total monetary value that customers can use for calls with different rates such as intrastate, interstate, or international calls.</p> <p>These cards provide consumers the flexibility to make a variety of calls. If the relevant rates for each type of call are disclosed, consumers can make informed decisions about the minutes of calling available on the cards they purchase. Therefore, disclosing either the number of minutes or the value of the card and applicable rates will foster competition and provide more flexibility to customers.</p>	<p>Staff agrees. The proposed rule in Attachment 1 now includes Verizon’s suggested language. Prepaid cards are typically sold for a monetary value and the number of minutes a consumer can use will vary based on the jurisdiction of the calls (intrastate, interstate or international). Therefore, it is not possible to accurately state the number of minutes a consumer can have for any one card of a given monetary value.</p>
WAC 480-120-264(5)(a)	Lisa D’Amato on behalf of <i>Paracom, Inc.</i> (“Paracom”)	Paracom opposes disclosing the number of minutes on its prepaid phone cards. The dollar amount is on the phone card and the rate per minute is listed on their phone card vending machines.	<p>Clarification. The proposed rule allows companies to disclose information <i>either</i> on the card <i>or</i> on its packaging.</p>
		<i>Continued on next page.</i>	

<p>WAC 480-120-264(5)(a)</p>	<p>David Collier on behalf of <i>AT&T Communications of the Pacific Northwest, Inc.</i> (“AT&T”)</p>	<p><u>Disclosure of Rates, Terms and Conditions in Language Advertised:</u> AT&T does not oppose the addition of the language as proposed.</p> <p><u>Disclosure of Number of Minutes on Card or Packaging:</u> AT&T proposes that this requirement be broadened to allow the disclosure of the value of the prepaid calling services – either in dollars or minutes – on the card or its packaging. The number of minutes that any card will provide may vary depending on how the card is utilized. The disclosure of the dollar value of the card along with the methodology that can be employed to determine the number of minutes for any calling scenario provides the consumer with clear disclosure of the value of the card.</p>	<p>Clarification. The proposed rule in Attachment 1 is now consistent with AT&T’s recommendation.</p>
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