

December 10, 1999

Carole Washburn, Executive Secretary
Washington Utilities and Transportation Commission

via e-mail
records@wutc.wa.gov

1300 South Evergreen Park Drive SW
PO Box 47250
Olympia, WA 98504-7250

Re: Washington Docket No. UT 991737

Dear Ms. Washburn:

Please find attached comments in the above referenced docket.

Sprint's comments can be summarized as follows:

Sprint is generally satisfied with existing line extension tariffs; however, it would like to clarify the distinction between line extension charges and special construction. Sprint does not believe that all ratepayers should bear the cost of extending infrastructure to remote locations. If it is deemed to be in the public interest that some support be provided through a universal service program, then a threshold should be established to determine eligibility. A cap should be set on the amount a primary residence should be expected to pay, with the balance funded through universal service. Statutory changes would be required to implement such a program, and the state will need to ensure compliance with Section 254(f) provisions of the Telecommunications Act. Any rule created should be equitable and non-discriminatory. Some flexibility should be granted to companies regarding specific line extension tariffs to accommodate unique circumstances.

Should you have any questions, please contact me at 541/387-9265.

Sincerely,

Nancy L. Judy

NLJ/sm
Enclosure

CERTIFICATE OF SERVICE
Docket No. UT – 990261

I hereby certify that Comments of Sprint Communications Company, L.P. and United Telephone Company of the Northwest d.b.a. Sprint were sent via fax and regular mail on June 10, 1999 to:

Carole Washburn
Executive Secretary
Washington Utilities & Transportation
Commission
1300 South Evergreen Park Drive, SW
PO Box 47250
Olympia, WA 98504-7250

Sue McKenzie, Secretary

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