

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of:)
)
Verizon Northwest, Inc.) DECLARATION OF
) ALAN DICKSON
_____)

ALAN DICKSON, under penalty of perjury and the laws of the state of Washington, declares as follows:

1. I am over 18 years of age, a citizen of the United States, a resident of the state of Washington, and competent to be a witness.
2. I am employed by the Washington Utilities and Transportation Commission (WUTC) as a MCLE Special Investigator in the Regulatory Services Division. I have been employed by the WUTC for twenty-three years, holding various positions. As an MCLE Special Investigator, part of my responsibilities includes uniform enforcement of state laws and rules governing operator services providers.
3. Verizon Northwest, Inc. (Verizon) is an operator services provider registered with the Washington Utilities and Transportation Commission and is subject to the Revised Code of Washington and Washington Administrative Code governing operator services providers.
4. On November 3 and 7, 2000, as part of the Verizon staff investigation, I placed at least one collect call from each of seventeen payphones located in Washington. Following the directions posted on the payphones, I performed the steps detailed in Attachment 1 in order to make a collect call from the payphones indicated in the attachment.
5. While the Verizon automated operator provided a message that stated rate information was available by pressing "0", after dialing "0" and the live operator came on the line, the operator did not offer a rate quote or ask if I wanted a rate quote for sixteen of the seventeen calls placed.

6. The sequence of events I experienced in placing these collect calls leads me to believe that Verizon is in violation of WAC 480-120-141(2)(b), Verbal disclosure of rates. This rule states, "Before an operator-assisted call from an aggregator location may be connected by a presubscribed OSP, the OSP must verbally advise the consumer how to receive a rate quote, such as by pressing a specific key or keys, but no more than two keys, or by staying on the line. This message must precede any further verbal information advising the consumer how to complete the call, such as to enter the consumer's calling card number. This rule applies to all calls from payphones or other aggregator locations . . .".

DATED this 19th day of December, 2000, at Olympia, Washington.



Alan Dickson, MCLE Special Investigator

ATTACHMENT 1

Verizon Service Center
245 Vista Drive
Ferndale, Washington
360-382-9972

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 8:28 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Rose) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes plus taxes.

Haggen Food & Pharmacy
1815 Main St.
Ferndale, Washington
360-384-9940

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 8:47 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Kim) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes.

Cost Cutter Foods
1750 Labounty Drive
Ferndale, Washington
360-384-9969

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 9:11 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator came on the line. There was no rate quote offered until I asked the operator for it and the operator transferred me to a supervisor, Mrs. Brogan, for the rate quote. The rate quoted was \$2.47 for the first minute, \$.17 for additional minutes plus taxes, but the amount of the surcharges were unknown .

AM/PM

1197 Slater Road

Ferndale, Washington

360-384-9937

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 9:33 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Joan) came on the line. There was no rate quote offered until I asked the operator for it. Operator stated surcharge and taxes were unknown, varied city to city. Connection was lost. Redialed at 9:39 a.m. and operator quoted rate as \$2.65 for the first minute and \$.15 for additional minutes plus tax and surcharge.

ANW Market

5692 Northwest Road

Bellingham, Washington

360-384-0137

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 9:54 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Linda) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes plus taxes and surcharge, as applicable.

Midway Chevron

6905 Guide Meridian

Lynden, Washington

360-398-9992

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 10:20 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Anna) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes.

RiteAid
8156 Guide Meridian
Lynden, Washington
360-354-9912
November 3, 2000

Following the directions posted on the payphone, I performed the following steps:
Collect Call at 10:38 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Tammy) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.40 for the first minute and \$.10 for additional minutes plus taxes and surcharges.

McDonalds
8140 Guide Meridian
Lynden, Washington
360-354-9908
November 3, 2000

Following the directions posted on the payphone, I performed the following steps:
Collect Call at 10:47 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes.

Laurel Corner Market
5927 Guide Meridian Road
Bellingham, Washington
360-398-9903
November 3, 2000

Following the directions posted on the payphone, I performed the following steps:
Collect Call at 11:15 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Rose) came on the line and offered a rate quote. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes plus taxes.

Glynn's Shamrock Pub
5309 Guide Meridian
Bellingham, Washington
360-398-9915

November 3, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 11:26 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Sinclair) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.40 for the first minute and \$.10 for additional minutes then the operator corrected the rate quote to be \$2.47 for the first minute and \$.17 for additional minutes.

USA Mini-Mart
371 3rd
Blaine, Washington
360-332-9938

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 10:12 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Kenna) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes plus taxes and surcharge.

Blaine Harbor Gate 3
277 Marine Drive
Blaine, Washington
360-332-9935

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 10:30 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Cheryl) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.65 for the first minute and \$.15 for additional minutes plus taxes and surcharge.

**Blaine Harbor Office
235 Marine Dr.
Blaine, Washington
360-332-9943**

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:
Collect Call at 10:42 a.m.: On the first attempt, I dialed 0 plus the area code plus the called party's number. I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and the call was placed to the called party's number without being routed through the rate information. On the second attempt at 10:44 a.m., I reached operator (Bob). There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.65 for the first minute, but the rate for additional minutes was not known.

**WA State Department of Transportation
Interstate 5 – South
Custer Rest Area
Custer, Washington
360-366-9927**

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:
Collect Call at 11:41 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.65 for the first minute. The rate for additional minutes was unknown, the operator stated it did not show on the screen.

**WA State Department of Transportation
Interstate 5 South
Custer Rest Area
Custer, Washington
360-366-9946**

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:
Collect Call at 11:47 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.47 for the first minute and \$.17 for additional minutes plus taxes.

AM/PM

6890 Portal Way

Ferndale, Washington

360-384-9968

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 11:58 a.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.40 for the first minute and \$.10 for additional minutes plus taxes.

McDonalds

1688 Main Street

Ferndale, Washington

360-384-9920

November 7, 2000

Following the directions posted on the payphone, I performed the following steps:

Collect Call at 12:10 p.m.: I dialed 0 plus the area code plus the called party's number. At the tone, I received an automated message that stated, "Welcome to Verizon. To obtain the rate for this call press "0" for an operator." I pressed 0 and an operator (Hope) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$2.45 for the first minute and \$.17 for additional minutes.