

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

**UT-991301**

Rules Relating to Price Lists	)	
Commission General -	)	COMMENTS OF SPRINT
Tariffs: WAC 480-80-035	)	

Sprint appreciates this opportunity to comment on the February 9 proposed draft of Price List Rule WAC 480-80-035.

While Sprint agrees with staff that a clarification and possibly even elaboration of price list rules is necessary, we do have some concerns about the proposal at hand.

One fundamental concern is the apparent contradiction between (1)(b) and (2)(c). If the price list is not to be reviewed or approved by the Commission at the time of filing, why should there be a requirement that it be filed ten days in advance? Given the Commission's valid concern that customers be notified of rate increases, however, our suggestion would be that for rate decreases the price list become effective immediately and that ten-days customer notice be required only for rate increases. Our proposed language for (2)(c) would be:

Any new price list or decrease to rates in a price list filed by a registered telecommunications company becomes effective immediately upon filing; an increase to rates in a price list becomes effective immediately upon filing if existing customers have already received ten-day notice or, if they have not already received notice, ten days after they do receive notice.

Proposed provision (1)(c) is of particular concern to Sprint's Long Distance Division because a number of third-party channels are used for acquiring customers, such as Radio Shack and local providers. These third parties do not in the normal course of business have a full written list of product descriptions and prices that could be handed over to or sent to the customer who signs up. We strongly believe the

Commission should continue to deem a customer to have constructive knowledge of the provisions of price lists just as they do tariff filings. There is no essential difference between the two in terms of customer awareness or access.

Sprint objects to the wording of (1)(d) since it seems to explicitly pre-empt any possibility that the company might be correct in its position in any dispute with a customer concerning a price list.

Sprint respectfully suggests that proposed provision (1)(e) be reconsidered. Thirty days is an adequate notice for canceling an agreement in a competitive market. There is no inconvenience to a long distance customer, for instance, if they have thirty days rather than a year's notice of some change to their calling plan.

Respectfully submitted this 2nd day of March, 2001, by

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Nancy L. Judy  
State Executive – External Affairs