

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

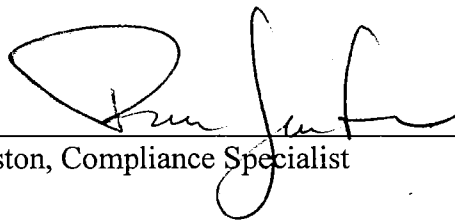
In the Matter of:)
)
Verizon Northwest, Inc.) DECLARATION OF
) ROBERT JOHNSTON
_____)

ROBERT JOHNSTON, 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 Compliance Specialist in the Regulatory Services Division. I have been employed by the WUTC for twenty-two years, holding various positions. As a Compliance Specialist, 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, 2000, as part of the Verizon staff investigation, I placed at least one collect call from each of six 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 five of the six 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 4 day of December, 2000, at Olympia, Washington.

A handwritten signature in black ink, appearing to read "Robert Johnston", written over a horizontal line.

Robert Johnston, Compliance Specialist

ATTACHMENT 1

**101 Main Street
Edmonds, Washington
425-771-9711**

November 3, 2000

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

Collect Call at 8:16 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 (Maralyn) 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 \$.17 for additional minutes.

**7-Eleven
21202 52nd Ave. W.
Mountlake Terrace, Washington
425-774-9971**

November 3, 2000

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

Collect Call at 9:25 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 (Janice) came on the line. There was no rate quote offered until I asked the operator for it. The rate quoted was \$1.17 for the first minute and \$.17 for additional minutes.

**7-Eleven
21202 52nd Ave. N.
Mountlake Terrace, Washington
425-774-9911**

November 3, 2000

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

Collect Call at 9:12 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 (Dakota) came on the line. Part way through another operator came on line who took the called number again and placed the call. 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.

Hilltop Drive-In
722 Broadway
Everett, Washington
425-252-99--

November 3, 2000

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

Collect Call at 12:14 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 came on the line. While waiting for the call to go through, a second operator (Jeannie) came on the line and put the call through. Could hear entire conversation she had with Leon. There was no rate quote offered until I asked the operator for it. The rate quoted was \$1.17 for the first minute and \$.17 for additional minutes.

1001 Broadway
Everett, Washington
425-252-9929

November 3, 2000

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

Collect Call at 12:30 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 came on the line. The operator offered a rate quote. The rate quoted was \$2.17 for the first minute and \$.17 for additional minutes.

1001 Broadway
Everett, Washington
425-252-9972

November 3, 2000

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

Collect Call at 12:37 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 (Debbie) 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.