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March 2, 2001

Ms. Carole J. Washburn
Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Dr., S.W.
P.O. Box 47250
Olympia, Washington 98504-7250

Subject: Docket No. U-991301
Commission General - Tariffs: WAC 480-80-035
Rules Relating to Price Lists
Comments of MetroNet Services Corporation, Inc.

Dear Ms. Washburn:

On behalf of MetroNet Services Corporation, Inc. (MetroNet), these comments with respect to the price list rules are being submitted in the above-referenced docket. MetroNet is currently a rebiller of U.S.West's Centrex service and expects to become a reseller of local exchange services shortly. MetroNet appreciates the efforts of the Commission to update these rules to reflect the changed environment for telecommunications and to work with companies in this process to develop rules that will advance competitive telecommunications in Washington.

MetroNet has identified an area of concern in the proposed price list rules. Proposed rule WAC 480-80-035(3) would require telecommunications companies, regardless of size, to maintain a website on which to post price lists. The Commission should be aware that not all telecommunications companies currently maintain websites. The cost of building a website that reflects a positive public image for a company and maintaining such a website can be costly for a small company, especially when a company is required to do continual maintenance of the website to ensure that the website is immediately updated to reflect price list changes. MetroNet, which serves very small business customers, is not even certain that all its customers have the capability to access such a website if such a site were established.

While MetroNet recognizes that use of a website to permit customers to view price lists can be a desirable channel for consumer access to information where there is a large

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customer base, MetroNet proposes that the Commission apply this requirement only to companies with \$20 million and over in regulated annual revenues. For small companies, posting price lists on a website may not be the most cost-effective way to communicate with customers and the Commission should not impose such a requirement unless it can show that benefits would outweigh costs. Unless the Commission exempts smaller companies as suggested, MetroNet requests the Commission prepare a Small Business Impact Statement to measure the impact of this rule.

MetroNet asks that the Commission be mindful that most competitive local exchange companies are currently in a cost-cutting mode due to an uncertain economy. Therefore, the Commission should be careful that it not impose additional cost burdens on such carriers without a showing that there is a very strong public need for such expenditures.

Very truly yours,

Terry F. Berman
Counsel for MetroNet Services Corporation,
Inc.

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BERMAN:mc
File No.: 501850-0031
Doc ID: SEADOCS:96778.1