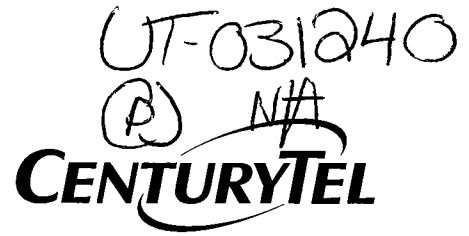


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**Calvin K. Simshaw**  
Vice President  
Associate General Counsel - Regulatory



July 29, 2003


Ms. Carole J. Washburn  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Dr. SW  
PO Box 47250  
Olympia, WA 98504-7250

Re: In the Matter of the Petition of CenturyTel for a Partial Waiver of WAC 480-80-103 (2) (c) Relating to Tariff Sheet Format

Dear Ms. Washburn:

Enclosed for filing is the original and 19 copies of the *Petition of CenturyTel for Partial Waiver of Tariff Sheet Format Rules* in the above-referenced matter.

Very truly yours,

  
Calvin K. Simshaw  
Assoc. General Counsel-  
Regulatory

Enclosures

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COMMISSION

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION  
COMMISSION

In the Matter of the Petition of )  
CenturyTel For a Partial Waiver of )  
WAC 480-80-103 (2) (c) Relating to )  
Tariff Sheet Format )

DOCKET NO. UF 031240

PETITION OF CENTURYTEL FOR PARTIAL WAIVER  
OF TARIFF SHEET FORMAT RULES

1. Petitioners, CenturyTel of Washington, Inc., d/b/a CenturyTel, CenturyTel of Inter Island, Inc., d/b/a CenturyTel and CenturyTel of Cowiche, Inc., d/b/a CenturyTel (collectively "CenturyTel" or "Petitioners") hereby request that the Commission authorize a partial waiver of the requirements of WAC 480-80-103 Subpart (2) (c) pertaining to the requirement that the name of every issuing carrier appear on every sheet of the tariff. Petitioners are each operating subsidiaries of CenturyTel, Inc. with their business address at:

CenturyTel  
8102 Skansie Avenue  
Gig Harbor, Washington 98335

Petitioners' authorized representative in this matter is:

Calvin Simshaw  
Assoc. Gen. Counsel  
CenturyTel  
805 Broadway  
Vancouver, WA 98660

(360) 905-5958 Voice  
(360) 905-5953 Fax

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UTIL. AND TRANSP.  
COMMISSION

2. CenturyTel seeks a partial waiver of the requirements in WAC 480-80-103 Subpart (2) (c). The request is brought pursuant to WAC 480-80-015 which provides for exemptions from rules in Chapter 480-80 WAC.

3. In support of its Petition, CenturyTel states as follows: Petitioners are providers of regulated telecommunications services in the state of Washington and as such are generally subject to the Commission's jurisdiction. Petitioners are subject to the requirements set forth in WAC 480-80-103 relating to Tariff Format.

4. WAC 480-80-103 (the "Tariff Format Rule") sets forth various structure and formatting requirements applicable to tariffs maintained by telecommunications companies subject to the Commission's jurisdiction. Subpart (2) (c) of the Tariff Formatting Rule specifically requires that:

(2) **Sheet requirements.** Each tariff sheet must specify:

...

...

(c) The name of the utility issuing the tariff, and

...

5. For many years now CenturyTel has maintained Tariff WN U-1 containing rates, terms and conditions applicable to service in the local exchanges of both CenturyTel of Washington, Inc. and CenturyTel of Inter Island, Inc. On July 14, 2003, CenturyTel made a filing (Advice No. 03-23) to re-issue tariff WN U-1. The reissued tariff makes no changes to the rates, terms or conditions applicable to service rendered in the CenturyTel of Washington, Inc. and CenturyTel of Inter Island, Inc. local exchanges. The reissued tariff is named "WN U-1 CenturyTel of Washington, Inc." The reissued

tariff, on the title page, lists both CenturyTel of Washington, Inc. and CenturyTel of Inter Island, Inc. as issuing carriers. The tariff shows the name CenturyTel of Washington, Inc. on each and every page. However, the name CenturyTel of Inter Island, Inc does not appear on each and every page. Therefore, without an exemption, the reissued tariff would not technically comply with WAC 480-80-103 Subpart (2) (c).

6. CenturyTel submits that strict compliance with WAC 480-80-103 Subpart (2) (c) would require adding a line of text to every page of Tariff WN U-1 thereby causing re-pagination in some sections and adding to the overall bulk of the tariff. CenturyTel asserts that these negative factors outweigh any gain from adding the name “CenturyTel of Inter Island, Inc.” to every page of the tariff.

7. CenturyTel submits that no harm will occur with grant of its waiver request. The local exchanges of CenturyTel of Washington, Inc. and CenturyTel of Inter Island, Inc. have for some time been included in the same tariff. Both companies operate under the d/b/a “CenturyTel” and customers of both companies have come to know their serving local exchange carrier as simply “CenturyTel.” CenturyTel is unaware of any problems or confusion on the part of CenturyTel of Washington or CenturyTel of Inter Island customers attempting to locate the tariff applicable to their exchanges. CenturyTel of Inter Island, Inc. is clearly listed as an issuing carrier at the front of WN U-1.

8. CenturyTel also seeks a waiver of WAC 480-80-103 Subpart (2) (c) with respect to Tariff WN U-4 which deals with access charges for CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., and CenturyTel of Cowiche, Inc. For many years now CenturyTel has maintained Tariff WN U-4 containing rates, terms and conditions applicable to access services provided by CenturyTel of Washington, Inc., CenturyTel of

Inter Island, Inc, and CenturyTel of Cowiche, Inc.. On July 23, 2003, CenturyTel made a filing (Advice No. 03-28) to re-issue tariff WN U-4. The reissued tariff makes no changes to the rates, terms or conditions applicable to access services rendered by CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc or CenturyTel of Cowiche, Inc. The reissued tariff is named "WN U-4 CenturyTel of Washington, Inc." The reissued tariff, on the title page, lists all three companies: CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc., and CenturyTel of Cowiche as issuing carriers. The tariff shows the name CenturyTel of Washington, Inc. on each and every page. However, the names CenturyTel of Inter Island, Inc. and CenturyTel of Cowiche, Inc. do not appear on each and every page. Therefore, without an exemption, the reissued Tariff WN U-4 would not technically comply with WAC 480-80-103 Subpart (2) (c).

9 CenturyTel submits that strict compliance with WAC 480-80-103 Subpart (2) (c) would require adding two lines of text to every page of Tariff WN U-4 thereby causing re-pagination in some sections and adding to the overall bulk of the tariff. CenturyTel asserts that these negative factors outweigh any gain from adding the names "CenturyTel of Inter Island, Inc." and "CenturyTel of Cowiche, Inc." to every page of Tariff WN U-4.


10. CenturyTel submits that once again no harm will occur with grant of this portion of the waiver request. The rates, terms and conditions applicable to access services rendered by CenturyTel of Washington, Inc., CenturyTel of Inter Island, Inc. and CenturyTel of Cowiche, Inc. have for some time been included in the same tariff. All three companies operate under the d/b/a "CenturyTel" and access customers of all three companies have come to know the originating or terminating local exchange carrier as

simply "CenturyTel." CenturyTel is unaware of any problems or confusion on the part of CenturyTel of Inter Island or CenturyTel of Cowiche access customers attempting to locate the tariff applicable to access charges rendered by these two companies. CenturyTel of Inter Island, Inc. and CenturyTel of Cowiche, Inc. are clearly listed as issuing carriers at the front of WN U-4.

NOW THEREFORE, CenturyTel requests that the Commission grant it a waiver of WAC 480-80-103 Subpart (2) (c) such that CenturyTel not be required to put the name of all issuing carriers on every page of Tariff WN U-1 and WN U-4

Respectfully submitted this 29thth day of July 2003.

CENTURYTEL OF WASHINGTON, INC.  
CENTURYTEL OF INTER ISLAND, INC.  
CENTURYTEL OF COWICHE, INC.

By:   
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Assoc. Gen. Counsel

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