

T6-032075 (P)

RUBATINO REFUSE REMOVAL INC.

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December 11, 2003

Betty Young
Washington Utilities and Transportation Commission
PO Box 47250
Olympia WA 98504-7250

Re: Letter of November 17, 2003
Waiver of Rule

Dear Ms. Young:

This is in reference to your letter indicating that our bills do not show a delinquent date. We wish to apply for a waiver of this rule.

We have always billed our residential accounts so that we can mail them on the last working day of the month. Our customers have become accustomed to receive our bills on the days immediately after that. We then bill our commercial customers for service through the last day of the month and run the statements as soon after that as possible. Typically, we mail the commercial statements on the second or third of the month, depending on how the weekend falls. It is essential to get the bills to the customers as early as possible to coincide with their payment schedules.

As you will have noticed, we do print on the front of the residential bills that payment is due by the 21st of the current month if the billing is for a one month period and on the 21st of the following month if it is a two month billing. The implication is that the bill is delinquent if the payment is received after that. In addition, it does reiterate on the back of the bill, under the Credit Policy, the delinquent and cancellation policies.

The rationale of the 21st policy is that it gives the customers sufficient time to get their payments in to us and have them posted before the next billing, and, thereby avoid any late notices or fees. De facto, if the payment reaches us after the 21st, but before we actually run the bills, there are no late fees assessed. In addition, every customer is called prior to service being cut off. I am not aware that these policies have been a problem for our customers, nor have we been notified that the Commission has received any complaints in this regard. We have used these policies forever.

Before we begin any collection process, every customer is notified by letter that we are going to proceed in that direction.

For the above reasons, we are seeking a waiver of this rule.

Sincerely,


Lawrence R. Goulet

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION
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