

September 30, 2004

VIA E-MAIL AND UPS OVERNIGHT DELIVERY

Carol J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504-7250

Re: *Petition for Temporary Waiver of WAC 480-120-161(2)
on Behalf of MCI*

Dear Ms. Washburn:

Enclosed for filing on behalf of MCI are the original and twelve (12) copies of MCI's Petition for Temporary Waiver. Please contact Michel Singer Nelson of MCI if you have any questions.

Sincerely,

ATER WYNNE LLP



Arthur A. Butler

Enclosure
212585_1.DOC

BEFORE THE WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION

)

)

REQUEST FOR TEMPORARY WAIVER OF) DOCKET NO.
WAC 480-120-161(2))
) MCI'S PETITION FOR TEMPORARY
) WAIVER
)
)
)
)
)
_____)

MCI, Inc., hereby petitions the Washington Utilities and Transportation Commission ("Commission") for a temporary waiver of rule WAC 480-120-161(2).

THE RULE

1. Section 2 of WAC 480-120-161 reads as follows:

(2) Length of time for payment of a bill. Bill due dates must reflect a date which at a minimum allows a customer fifteen days from the date of mailing for payment.

2. MCI's systems allow customers 21 days from the date the bill is mailed for "on-time" payment. Thus, MCI satisfies the requirement of the rule as to current charges. However, when any past due charges exist on an account, MCI's current systems list one "Payment Due Date" as "Upon Receipt." While MCI in fact grants the customer a normal 21-day payment due date cycle for the

portion of the bill that represents current charges, the invoice presentation only permits one entry into the category "Payment Due Date." Consequently, the Commission Staff expressed concern that the bill presentation is unclear as to whether customers have 15 days or more to pay the current charges due.

3. For these limited circumstances, to address the Staff's concerns, MCI asks the Commission to grant a temporary waiver of the requirement that the bill "reflect a date that is fifteen days from the date of mailing for payment." MCI is working on a plan to modify its systems to create separate entries, called "Past-Due Charges Due" and "Current Charges Due." When the modification is complete, the invoice will continue to display "Upon Receipt" for the "Past Due Charges Due" category, while "Current Charges Due" will reflect a date, which is 21 days after the invoice posting date. MCI expects this system enhancement to be implemented during the first quarter of 2005. Unfortunately as a result of budget and resource constraints, MCI is not able to implement the systems enhancement sooner, given the extensive coding changes and system testing required for implementation.

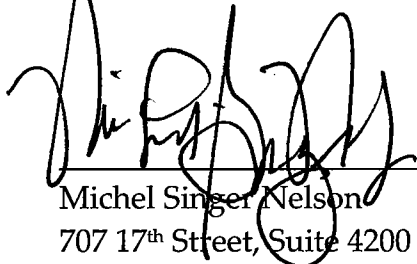
4. WAC 480-120-015 provides that the Commission may grant an exemption from the provisions of any rule in Chapter 480-120-WAC, if consistent with the public interest, the purposes underlying the regulation and applicable statutes.

5. Customers are not unduly harmed by MCI's current inability to display separate payment due dates for past due charges and current charges since they are allowed 21 days to pay the current charges. In addition, MCI is using its best efforts to address Staff's concerns. Thus, it is in the public interest to grant this request.

6. Wherefore, MCI respectfully requests that the Commission grant its request for a temporary waiver of WAC 480-120-161(2) under the limited circumstances described above, through and including March 31, 2005.

Dated this 30th day of September 2004.

MCI

A handwritten signature in black ink, appearing to read "Michel Singer Nelson", is written over a horizontal line. The signature is stylized and cursive.

Michel Singer Nelson
707 17th Street, Suite 4200
Denver, CO 80202
(303) 390 6106
(303) 390 6333
michel.singer_nelson@mci.com