

September 1, 2005

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VIA FEDERAL EXPRESS

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

RECEIVED
RECORDS MANAGEMENT
05 SEP - 2 AM 10: 25
STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

**Re: Petition of Verizon Northwest Inc. for Permanent
Waiver of WAC 480-120-104**

Dear Ms. Washburn:

Enclosed please find an original and 20 copies of the Petition of Verizon Northwest Inc. For Permanent Waiver of WAC 480-120-104 and Declaration of Service to be filed in the above-referenced matter.

Please date-stamp and return to us with the UT Number, a copy of the filing for our records in the enclosed stamped, self-addressed envelope provided for your convenience. If you have any questions, please call me at (206) 340-9381.

Very truly yours,

GRAHAM & DUNN PC



Nancy E. Dickerson
Assistant to Judith A. Endejan

Enclosures

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ORIGINAL

BEFORE THE
UTILITIES AND TRANSPORTATION COMMISSION OF
THE STATE OF WASHINGTON

RECEIVED
RECORDS MANAGEMENT
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STATE OF WASH
UTIL. AND TRAN
COMMISSION

Petition Of Verizon Northwest Inc. For Permanent
Waiver From WAC 480-120-104 Relating To
Information To Consumers

Docket No. UT-

**PETITION OF VERIZON
NORTHWEST INC. FOR
PERMANENT WAIVER OF
WAC 480-120-104**

This petition is brought by Verizon Northwest Inc., 1800 Forty-First Street, Everett,
Washington 98201 (“Verizon”) pursuant to WAC 480-120-015.

I. RELIEF SOUGHT

1. Verizon requests that the Washington Utilities and Transportation Commission
 (“Commission” or “WUTC”) make permanent the temporary waiver of the Commission’s
 requirement, contained in WAC 480-120-104, to provide a welcome/confirming letter or notice
 to Verizon’s institutional and large business customers (“Enterprise” accounts) when adding a
 service, changing from one rate schedule to another or making a change resulting in a change in
 their current service terms or conditions. This temporary waiver was granted on September 24,
 2003 by Order No. 1 in Docket No. UT-031123. The conditions of the temporary waiver have
 been satisfied and a permanent waiver should be granted.

II. VERIZON REPRESENTATIVES

2. Verizon’s name and address is:

Verizon Northwest Inc.
Attn: Robert Millar
924 South Capitol Way, Suite 108
Olympia, Washington 98501

3. Counsel for Verizon is:

Judith A. Endejan
Graham & Dunn PC
Pier 70
2801 Alaskan Way ~ Suite 300
Seattle, WA 98121-1128

III. BACKGROUND

4. WAC 480-120-104 requires telecommunications companies to provide welcome letters to applicants regarding the services the applicant initially obtains from Verizon. The rule additionally requires companies to provide confirmation notices to its customers when there are changes in services, rate schedules, terms, or conditions of their existing service. This rule applies to changes made to all customer accounts, including both residential and business accounts, irrespective of size.

5. Verizon's "Enterprise" accounts consist of larger private businesses and institutional accounts, including state and local government agencies and school districts. The key distinction between Enterprise accounts and other accounts is the assignment of an account team that specializes in assisting the Enterprise customer with any changes to the account. No strict line-count criteria determines Enterprise designation, but customer revenue levels are considered. The company adjusts the specific makeup of the sector from time to time for administrative reasons. Each year Verizon sends each Enterprise customer written notice of their assigned account team, with contact information for matters ranging from billing, to ordering, to repair. The customers are also notified of changes in this information that may occur during the year. The assigned account team generally handles all service requests. In many instances the communication between customers and their account team takes place electronically, with order

confirmations sent via e-mail. Even if electronic communication is not a customer's choice, there is frequent communication between Enterprise customers and Verizon.

6. Because of the constant communication between Enterprise customers and their Verizon account manager, far more service orders are placed than for a residential or other business customer account. To issue a confirmation notice every time an Enterprise customer makes a material change in service would be burdensome for Verizon, would be confusing for customers who operate on a real-time basis with their account representatives and would be unnecessary to fulfill the purpose of WAC 480-120-104, which is to provide customers information pertaining to the services they have purchased. Verizon's assignment of account teams to its Enterprise customers fulfills this purpose without the need for standardized, mass market "welcome" letters or "confirmation" notices.¹

7. In Order No. 1 in Docket No. 031123, the Commission granted a two-year waiver on two conditions: first, that Verizon continue to assign account managers to work directly with Enterprise customers; second, that the Commission Staff monitor complaints from such customers regarding an exemption from WAC 480-120-104. Since Order No. 1, Verizon has satisfied, and intends to satisfy continually, the first condition. Regarding the second condition, no customer complaints have been lodged with the Commission from a Verizon Enterprise customer. Accordingly, any past concern of the Commission about customer notice to Enterprise customers has been satisfied. In addition, on July 29, 2005, the Commission granted Qwest

¹ See Letter from Arthur A. Butler, Counsel, Washington Electronic Business and Telecommunication Coalition to Carol J. Washburn, Executive Secretary, Washington Utilities and Transportation Commission filed in Docket No. UT-050989 in support of similar petition made by Qwest Corp. (July 21, 2005) (noting that the written confirmation requirement is inappropriate for large business customers and may result in additional confusion).

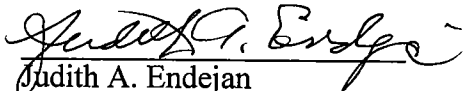
Corporation a waiver of the WAC 480-120-104 in Order No. 1 in Docket No. UT-050989 for the same reasons raised by Verizon in this petition, namely, large customers that are assigned account managers do not need welcome letters and confirmation notices to understand their service orders. Thus, Verizon should be given the same relief as Qwest and it should receive a permanent waiver of WAC 480-120-104 for Enterprise customers.

IV. CONCLUSION

8. Verizon's Enterprise account procedures satisfy the purpose of WAC 480-120-104 by providing customers with notification and confirmation of service orders and changes. Consequently a permanent waiver of the rule's requirement to send written notification of new and change orders relating to Enterprise accounts is warranted, consistent with the public interest.

Respectfully submitted this 1st day of September 2005.

GRAHAM & DUNN PC

By 
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Attorneys for Verizon Northwest Inc.