

June 10, 2003

**Supplemental Comments of The Citizens' Utility Alliance of Washington
UT-030860**

After having reviewed the comments submitted by Verizon in this matter and reading its misinterpretation of WAC 480.120.174 we ask the Commission to reject Verizon's interpretation of the WAC 480.120.174 in order to prevent Verizon and other companies from failing abide by its terms.

WAC 480.120.174 was proposed and adopted in order to allow low-income and vulnerable households to overcome the major barrier low-income advocates had identified to those households obtaining basic phone service. That is prior obligations.

WAC 480.120.174 is a balanced solution that addresses the problem. It allows people in such a situation to get hooked up, but also requires them to take responsibility for their prior debts and gives the phone companies the ability to restrict access to other services and features.

For Verizon to assert its own definition of "restoring service" and interpret the rule to apply only in instances of "temporary disconnection" is not in keeping with the intent of the rule and is in direct contradiction to paragraph 168 of the adoption order filed December 12, 2002 which states, "We have adopted a rule that provides for generous repayment terms for prior obligations arising out of local service." Clearly the rule applies to all disconnections.

Respectfully submitted,

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