**BEFORE THE WASHINGTON**

**UTILITIES AND TRANSPORTATION COMMISSION**

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| Rulemaking to Consider Revisions to WAC 480-120-264(5)(a) Prepaid Calling [Card] Services, Docket UT-100148 | ))) | DOCKET UT-100148**AT&T Communications of the Pacific**  |

 ) **Northwest, Inc.**

**COMMENTS**

 AT&T Communications of the Pacific Northwest Inc. (“AT&T”) hereby submits the following comments in response to the notice of opportunity to file written comments on the proposed rule amendments to Washington Administrative Code (WAC) 480-120-264 issued by the Washington Utilities and Transportation Commission (“Commission”) on May 5, 2010 in Docket UT-100148.

**RESPONSE**

 The proposed addition of “international” proposed to WAC 480-120-264(5)(a)(iii) combined with the addition of a new section, WAC 480-120-264(5)(d)[[1]](#footnote-1) creates an untenable situation whereby all international calling rates would have to be disclosed on a calling card or its packaging. For the reasons described below, the Commission should not require PPCS providers to list all international calling card rates on the card or its packaging. Instead the Commission should simply require that the card contain a toll free number and website (where the provider has a website) that lists all of the international rates. As such, AT&T, therefore, suggests the following changes to proposed WAC 480-120-264(5)(d):

If the PPCS provider issues a card, all information contained in this subsection **with the exception of international** rates must be disclosed on the card or its packaging. **International rates must be available through a toll free number and a website (if the PPCS provider has a website) that is listed on the card.**  Disclosures required in (a)(i) and (vi), (b)(i) and (ii) of this subsection must be on the card.

 AT&T’s prepaid calling cards allow customers to use AT&T’s international calling service to and from over 200 countries. The rates that customers pay for international calling depends on a number factors including whether the customer is calling from the United States to an international location or the customer is calling from an international location to the United States, and whether the customer is calling to or from a mobile phone. It would be impossible to include international rates for every call type on the card. In addition, international rates tend to change frequently thus making it impractical to print all of the rates for any international call on the card packaging. To address these practical issues while at the same time making sure that customers know the applicable international rates for the card, AT&T includes a website on its cards, [www.att.com/prepaid](http://www.att.com/prepaid). Further, AT&T prints the following information on its cards:

**Int’l rates are higher than state-to-state rates, differ according to area called and can change.** Call Customer Care for int’l calling information before leaving the U.S.

For these reasons, AT&T suggests that the Commission adopt its suggested changes to WAC 480-120-264(5)(d).

Also, AT&T does not believe it is necessary to make the proposed change from “card” to “service” in WAC 480-120-264(5)(a)(vi). The proposed changes to this section would mean that the service, not the card expires. This simply does not make sense. The card enables the customer to use the service and when the card expires the customer can no longer utilize the service. As no comments were submitted to address this change, AT&T is unclear of the rational for this change.

**CONCLUSION**

For the foregoing reasons, AT&T urges the Commission to adopt the amendments it suggests above.

Submitted this 7th day of June, 2010

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By: Cynthia Manheim, Esq., General Attorney

Representing AT&T Communications of the Pacific Northwest Inc.

PO Box 97061

16331 NE 72nd Way

Redmond, WA 98073-9761

Telephone: (425) 580-8112

Facsimile: (425) 580-8333

Email: cindy.manheim@att.com

1. Proposed WAC 480-120-264(5)(d) reads as follows:

If the PPCS provider issues a card, all information contained in this subsection must be disclosed on the card or its packaging. Disclosures required in (a)(i) and (vi), (b)(i) and (ii) of this subsection must be on the card. [↑](#footnote-ref-1)