

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

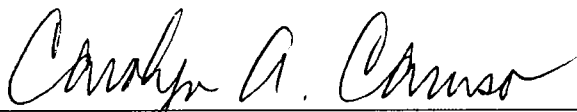
In the Matter of:)
)
Verizon Northwest, Inc.) DECLARATION OF
) CAROLYN A. CARUSO
)
_____)

CAROLYN A. CARUSO, under penalty of perjury and the laws of the state of Washington, declares as follows:

1. I am over 18 years of age, a citizen of the United States, a resident of the state of Washington, and competent to be a witness.
2. I am employed by the Washington Utilities and Transportation Commission (WUTC) as a Data Compiler in the Regulatory Services Division. I have been employed by the WUTC for eight years, holding various positions. As a Data Compiler, part of my responsibilities includes uniform enforcement of state laws and rules governing operator services providers.
3. Verizon Northwest, Inc. (Verizon) is an operator services provider registered with the Washington Utilities and Transportation Commission and is subject to the Revised Code of Washington and Washington Administrative Code governing operator services providers.
4. On November 7, 2000, as part of the Verizon staff investigation, I received at my personal residence seven collect calls placed by Commission Investigator Alan Dickson. The Verizon operators did not offer a rate quote for any of the calls I received. For each call I asked the operator what the cost of the collect call would be. The detail of my questions and the responses from the Verizon operators are listed in Attachment 1.

5 Each collect call I received leads me to believe that Verizon is in violation of WAC 480-120-141(1)(c), Operator service providers (OSP) general, which states, "In collect calls, both the originating party and the party on the terminating end of the call are consumers", and WAC 480-120-141(2)(b), Verbal disclosure of rates. The rule states, "Before an operator-assisted call from an aggregator location may be connected by a presubscribed OSP, the OSP must verbally advise the consumer how to receive a rate quote, such as by pressing a specific key or keys, but no more than two keys, or by staying on the line. This message must precede any further verbal information advising the consumer how to complete the call, such as to enter the consumer's calling card number. This rule applies to all calls from payphones or other aggregator locations...".

DATED this 5 day of December, 2000, at Olympia, Washington.



Carolyn A. Caruso, Data Compiler

ATTACHMENT 1

Date of Call: November 7, 2000

Time call was received: 10:13 a.m.

Investigator placing call: Alan Dickson

Statement of automated operator when call was answered: This is Verizon. If you want the rates, press 0.

After pressing 0, Was a Rate Quote Offered by the Operator? No. The automated operator stated, "Please hold for operator assistance." The rates quoted by the live operator were \$2.65 for the first minute and \$.15 for each additional minute.

Date of Call: November 7, 2000

Time call was received: 10:32 a.m.

Investigator placing call: Alan Dickson

Statement of live operator when call was answered: Will you accept a collect call from Alan Dickson?

Was a Rate Quote Offered by the Operator? No. After asking for the rates, the rates quoted by the live operator were \$2.65 for the first minute and \$.15 for each additional minute and any additional taxes from Verizon will be added.

Date of Call: November 7, 2000

Time call was received: 10:45 a.m.

Investigator placing call: Alan Dickson

Statement of live operator when call was answered: Will you accept a call from Alan? Operator did not indicate that he was the operator or if he was a Verizon operator.

Was a Rate Quote Offered by the Operator? No. After being asked for the rates, the rate quoted by the live operator was \$2.65 for the first minute. Operator couldn't give exact charges. He couldn't get into his computer.

Date of Call: November 7, 2000

Time call was received: 11:43 a.m.

Investigator placing call: Alan Dickson

Statement of live operator when call was answered: Collect call from Alan. Will you accept? No indication that she was a Verizon operator.

Was a Rate Quote Offered by the Operator? No. After being asked, the operator originally quoted \$2.65 for the call. I asked if that was the total for the call. She had to check. Then quoted \$2.40 for the first minute and \$.10 for each additional minute.

Date of Call: November 7, 2000

Time call was received: 11:49 a.m.

Investigator placing call: Alan Dickson

Statement of live operator when call was answered: Will you accept a collect call from Alan?

Was a Rate Quote Offered by the Operator? No. After being asked, the rates quoted by the live operator were \$2.47 for the first minute and \$.17 for each additional minute.

Date of Call: November 7, 2000

Time call was received: 12:01 p.m.

Investigator placing call: Alan Dickson

Statement of automated operator when call was answered: For rates for this call, press 0. If you will pay for this call press "1" from a touch tone phone.

After pressing 0, Was a Rate Quote Offered by the Operator? No. The automated operator stated, "Please hold for operator assistance." The live operator came on and asked, "Anyone there to accept a call from Alan?" After being asked, the rates quoted by the live operator were \$2.47 for the first minute and \$.17 for each additional minute.

Date of Call: November 7, 2000

Time call was received: 12:12 p.m.

Investigator placing call: Alan Dickson

Statement of live operator when call was answered: Will you accept a collect call from Alan?

Was a Rate Quote Offered by the Operator? No. After being asked the rates quoted by the live operator were \$2.45 for the first minute and \$.17 for each additional minute.

RECEIVED

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WASH. UT. & TRANS. COMM.

COPY

Adoption Notice

ADOPTION OF TARIFF, ETC.

Verizon Northwest Inc. hereby adopts, ratifies, and makes its own in every respect, as if the same had been originally filed by it, all tariffs, rules, notices, concurrences, provisions, authorities, power of attorney or whatsoever other instruments filed with the Washington Utilities and Transportation Commission or its predecessors by GTE Northwest Incorporated prior to June 30, 2000, the beginning of its possession. By this notice, it also adopts and ratifies all supplements or amendments to any of the above tariffs, etc. which have heretofore been filed with the Washington Utilities and Transportation Commission or its predecessors.

Tariff Adopted:

WAPL02

Transfer Authorized

by Order No. N/A

Issued July 7, 2000

Effective July 13, 2000

Issued by: Verizon Northwest Inc.

By: Lida C. Tong

Title Director-Regulatory & Governmental Affairs

Address: 1800 41st Street, P.O. Box 1003, Everett, WA 98206