



David A. Collier  
Area Manager - Regulatory

645 E. Plumb Lane  
PO Box 11010  
Reno, NV 89502

T: 775.333.3986  
F: 775-333-2364  
[david.collier@att.com](mailto:david.collier@att.com)

June 7, 2010

David Danner  
Executive Director and Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive SW  
P.O. Box 47250  
Olympia, WA 98504-7250

Re: Docket No. UT-100148

Enclosed for filing are comments from AT&T Communications of the Pacific Northwest, Inc. (AT&T) in the above mentioned matter. Please let me know should you have any questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "David Collier".

---

David Collier  
Area Manager - Regulatory

**BEFORE THE WASHINGTON  
UTILITIES AND TRANSPORTATION COMMISSION**

Rulemaking to Consider Revisions to ) DOCKET UT-100148  
WAC 480-120-264(5)(a) Prepaid Calling )  
[Card] Services, 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)<sup>1</sup> 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

---

<sup>1</sup> 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.

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

*Cynthia Manheim by Doc with permission.*

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](mailto:cindy.manheim@att.com)