

UT-160196 Telecommunications Rulemaking
Comment Summary Matrix CR101
 April 13, 2016

Section	Commenter	Comments	Staff Response
Amendments to or deletions of: WAC 480-120-021 -061(1)(d)(ii) -103(2) -174(2) -259 -352	Lisa Anderl, CenturyLink	CenturyLink does not have any comments on or objection to rule changes that clean up language from the previous rulemaking, or delete language related to WTAP and WECA.	Staff agrees.
	Richard Finnigan, Washington Independent Telecommunications Association (WITA)	WITA supports these changes.	Staff agrees.
	George Baker Thomson, Jr., Frontier Communications	Frontier supports these changes.	Staff agrees.
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Reinstatement of 480-120-440	CenturyLink	CenturyLink states the rule is not necessary as service quality is driven by competition. CenturyLink states the 48-hour metric in 480-120-440 was designed to allow the company “time to clear” the cause of the outage. The drop in access lines requires more travel between customers, and more than 48 hours is needed to restore service in many cases.	Staff disagrees. Staff finds the spike in service restoral violations since 480-120-440 was repealed clearly indicates that service quality has suffered without the rule. Since 480-120-440 was repealed, staff notes violation of 480-120-411(1)(c). This rule allows no delay - staff has been lenient in allowing 48 hours.

	WITA	WITA requests that the rule not be reinstated because a company that ignores the needs of its customers will lose those customers.	Staff disagrees. Staff believes complaint history since the rule was indicates a need for the rule.
	Frontier	Frontier opposes reinstatement. The company states that “No party, including staff, has made any showing that repealing WAC 480-120-440 impacted consumers in any manner, much less negatively.	Staff disagrees. Staff finds the spike in service restoral violations since 480-120-440 was repealed clearly indicates that service quality has suffered without the rule.
480-120-133 Response time for calls...	CenturyLink	CenturyLink believes the commission should consider repealing this rule because the market is competitieve.	This is outside the scope of this rulemaking.
Equal Access obligations	WITA	WITA suggests the commission take action to conform rules with “steps taken by the FCC in Order No. 15-166.”	This is outside the scope of this rulemaking.