

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

U-991301

Utility Tariffs – General,)
Chapter 480-80 WAC)

COMMENTS OF SPRINT

Sprint Communications Company on behalf of United Telephone Company of the Northwest and Sprint Communications Company L.P., (collectively hereafter “Sprint”) submits the following comments in response to the Commission’s April 5, 2001 Notice of Opportunity to File Written Comments on Customer Notification Requirements. Sprint welcomes this opportunity to comment on the proposed customer notice requirements for competitive and non-competitive telecommunications companies.

WAC 480-120-043, Alternative 1

Sprint would like a clarification on whether the rule applies to all services and under all circumstances. For instance, how would the proposed rule apply to companies operating under an alternative form of regulation, such as a Price Cap Plan? How would it apply to ILECs that offer a combination of services, some of which are deemed competitive?

In Section 3, Sprint seeks clarification on whether a single notice is contemplated for the services described in Section 3 (i.e., NSF, local taxes, etc.), or whether two notices are required: one before commission action pursuant to Section 1, and a second after commission disposition under Section 3(a).

WAC 480-120-043, Alternative 2

It appears that the subsection concerning Notice of Suspension and some of the associated language have been omitted inadvertently.

WAC 480-121-X04

Sprint does not support this proposal to provide customers with notification of a petition for classification of a service as competitive, at least in its current form. The language is practically an advertisement for competitor's services, and begs the question, "Who are the alternative providers?" It may also be confusing to customers. The notice contains conflicting messages, on the one hand suggesting there may be rate increases on ten days notice and on the other hand stating that the proposal does not change any rates. This language is likely to generate numerous inquiries both to the company and the Commission, rather than provide factual information that can assist the Commission in its decision. The process already provides for adequate representation of the public's interest, both through the Public Counsel's office and in the Commission review itself. According to RCW 80.36.330, the Commission must decide whether to classify the provider's services as competitive based on the merits of the petition and how well the company demonstrates that it has met the standards delineated in the statute. Certainly the Commission may want to consider any facts submitted by the public that are relevant to the statutory standards, but nothing in the law suggests that the petitioner should incur the burden of soliciting public comment.

WAC 480-120-X15

Sprint believes that customer notification for price decreases made by a competitively classified company are unnecessary. There is no financial harm to the customer associated with a price decrease and we see no reason to impose an unnecessary expense on a company in the event it wishes to lower the customer's monthly bill. Competitors are likely to advertise their price decreases to gain new.

customers and retain existing customers. If for some inexplicable reason a customer is unhappy with a price decrease, he/she can easily switch to another provider.

In summary, Sprint generally supports the Commission's proposed rules concerning customer notification with the exceptions noted above.

Respectfully submitted this 25th day of April 2001 by

Nancy L. Judy
State Executive – External Affairs