

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION**

RULEMAKING TO CONSIDER REVISIONS) DOCKET NO. UT-100148
TO WAC 480-120-264(5)(a) PREPAID CALLING)
SERVICES DISCLOSURE REQUIREMENTS.)

COMMENTS

MCI Communications Services Inc. d/b/a Verizon Business Services (“Verizon”) submits these comments in response to the Notice of Opportunity to File Written Comments (“Notice”) issued by the Washington Utilities and Transportation Commission (“WUTC” or “Commission”) on May 5, 2010. Verizon appreciates that in this Notice and the proposed rules which were attached, the Commission proposes to adopt Verizon’s recommendation for subsection WAC 480-120-264(5)(a)(iv) that was contained in its comments filed in this docket on March 22, 2010.

However, in this Notice and proposed rules, the Commission proposes an amendment to subsection WAC 480-120-264(5)(a)(iii) that was not proposed in the Notice issued February 19, 2010, and which states:

(5) Disclosure requirements - Prepaid calling services.

(a) A PPCS provider must disclose, prior to the sale, the following information:

...

(iii) The maximum charge per billing increment. A PPCS provider charging varying rates for intrastate (~~and~~), interstate, and international calls must disclose all applicable rates;

Verizon recommends that the Commission amend proposed subsection WAC 480-120-264(5)(a)(iii) to read as follows:

(5) Disclosure requirements - Prepaid calling services.

(a) A PPCS provider must disclose, prior to the sale, the following information:

...

(iii) The maximum charge per billing increment. A PPCS provider charging varying rates for intrastate, ~~((and))~~ interstate, and international calls must disclose all applicable rates OR PROVIDE A TOLL-FREE CUSTOMER SERVICE NUMBER ON THE PREPAID CALLING CARD OR PACKAGING WHERE A CONSUMER MAY OBTAIN THE RATES FOR INTERNATIONAL OR OTHER OUT-OF-STATE CALLS PRIOR TO PURCHASING THE PREPAID CALLING CARD;

This amendment is necessary because there is insufficient space on a prepaid calling card to disclose all applicable rates for international destinations or other locations outside the state of Washington. The rates for international calls can vary for each international destination as can rates for calls made from other locations away from Washington. There are hundreds of international destinations, in addition to 49 other states, to and from which a customer might place a call. In addition, it is not commercially practicable to create a different card for each possible international call destination for which a card may be used.

However, Verizon agrees that consumers should have the ability to obtain the rates for international calls and out-of-state calls before they purchase a prepaid calling card in order to determine whether to purchase the card. Verizon provides a toll free number on both the packaging and its prepaid calling cards, which a customer may call

prior to purchasing the card to determine the international and out-of-state rates that would apply if the prepaid calling card were to be purchased.

As long as relevant international and out-of-state rates are made available as proposed by Verizon, consumers can make informed decisions about the minutes of calling available on the cards they purchase. By providing a toll free number on both the packaging and the prepaid calling card which a customer may call prior to purchasing the card to determine international and out-of-state rates, consumers are able to make informed choices.

For the above reasons, if the Commission moves ahead with its proposed rules, Verizon urges that it adopt the amendment proposed above to subsection WAC 480-120-264(5)(a)(iii).

Dated: June 7, 2010

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By: _____

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