

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**U-991301**

Utilities General – Tariffs, Price Lists,	)	
and Contracts: Part B – Comprehensive	)	COMMENTS OF SPRINT
Review and Part D – Price Lists	)	

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 Notice of Opportunity to File Written Comments in this docket issued May 9, 2001.

480-80-010 Application of rules

Sprint seeks clarification on (4), which states that competitively classified companies are not exempt from WAC 480-80-010 through 480-80-0X3. Sprint cannot locate a 480-80-0X3; therefore, it cannot compare the new requirements to the existing requirement that specifies that such companies are not exempt from WAC 480-80-035. If it is correct to assume that 0X3 refers to 1X3, and further that the proposed rules will be organized in the order they are presented in the draft, then additional rules will be applied to competitively classified telecommunications companies than have been applied under the current rules. That is, the rules up through line 328 on page 11 would apply, which means, for instance, that a competitively classified company would now be required to provide the dollar amount and percentage of increase or decrease if the filing is a rate change. If this is the case, Sprint urges the Commission against imposing additional regulatory burdens on competitive companies. RCW 80.36.320 calls for minimal regulation for competitive telecommunications companies. Further the information called for goes well beyond RCW 80.36.110.

480-80-1X1- Definition and use of tariffs

Sprint understands that (4) is meant to replace the existing rule, 480-80-270(2); however, without that reference, it is difficult to discern the meaning. Sprint therefore, recommends the following language as a substitute for lines 152-153:

If the commission issues an order *that compels the company to refile its tariff*, each affected *tariff sheet should be marked as follows*:

480-80-1X2 – Tariff filing instructions

Sprint applauds the Staff's recommendation to eliminate the signature on every tariff sheet. The proposed authorized signature statement is a further step in streamlining the tariff filing process and will facilitate an electronic tariff filing process.

480-80-1X3 – Tariff content

Sprint seeks clarification on (5) regarding the placement of rates. Currently Sprint includes its rates in the individual sections of the tariff, along with the service descriptions, rather than listing all rates in a separate section. Does this rule mean the rates should be the last set of sheets in each section or does it mean that all the rates in the entire tariff should appear in the last pages of the tariff in a separate section? If the latter, Sprint believes this would make it much more difficult for customers to find the rates they are seeking. Also, is it intended that this new rule would require companies to re-file all of their current tariffs?

Sprint urges the Commission to continue to give the companies the flexibility to place rates in the tariff in any manner and location the company chooses as long as the result is a clear and comprehensive presentation of those rates.

Respectfully submitted this 31<sup>st</sup> day of May, 2001, by

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State Executive, External Affairs