

September 3, 2003

Ms. Carole J. Washburn,
Executive Secretary
Washington Utilities and
Transportation Commission
Chandler Plaza Building
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504

Subject: **UT-030964 – VERIZON COMMENTS**

Dear Ms. Washburn:

This letter is in response to your August 6, 2003 Notice of Opportunity to File Written Comments in the above referenced docket.

Verizon agrees with Qwest that WAC 480-120-146 should acknowledge and accommodate the difference between customer changes that involve a ported number and changes that do not. Verizon agrees with Sprint, however, that the amended rule should not confine companies to a single means of handling a ported number situation when other options are acceptable under national standards.

Most of the local exchange companies in Washington have multi-state operations and are subject to FCC rules and other national standards across their service areas. The WUTC should not impose state restrictions or burdens on the companies without a very strong justification, as such state-specific regulations increase costs and make operations more complex. As Sprint explains, there is no such justification here, and the language proposed by Sprint serves the needs of customers and the companies in a manner consistent with national standards.

Very truly yours,

Joan Gage
State Manager – Regulatory Affairs