**Qwest** 

## **DISCUSSION**

Qwest is seeking a temporary waiver of adopted rule WAC 480-120-161(5)(b) pertaining to the requirement that access or other charges imposed by the FCC be separately delineated on the Qwest customer bill statement and listed as a component of the charges for the specific service. Specifically, Qwest is requesting a temporary waiver of the rule from the effective date of July 1, 2003 until September 30, 2003. This will allow for the re-placement of the Interstate Subscriber Line Charge, Federal Universal Service Fund, and Federal Number Portability Charge from the current location on the bill under the category "Taxes, Fees, and Surcharges Summary" to a location separately listed as a component of exchange service charges.

Qwest requests this temporary waiver in order to achieve the efficiency of making multiple bill format changes at one time. Qwest intends to make other bill formatting changes to the Washington statements during September 2003. Coordination of bill formatting efforts will save Qwest expense by altering the bill statement only once, instead of twice in a short period of time. In addition, it will reduce customer confusion and concern, and the potential for additional calls to Qwest's business offices. Qwest seeks a temporary waiver until September 30, 2003, when Washington specific bill formatting changes are expected to be complete.

## CONCLUSION

Qwest seeks a temporary waiver of newly adopted rule WAC 480-120-161(5)(b) to implement all planned formatting and design changes, including re-placement of all federal charges on the Qwest Washington customer bill, at the same time. Allowing for such changes to occur at one time will minimize the overall expense associated with these formatting changes, limit customer confusion, and reduce the potential for additional calls to Qwest business offices regarding the changes. Qwest requests this temporary waiver for WAC 480-120-161(5)(b) from its effective date of July 1, 2003 to September 30, 2003.

Qwest

1	RESPECTFULLY SUBMITTED this 6 <sup>th</sup> day of June, 2003.
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