

# the park lane motel, suites & r.v. park

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CONSUMER AFFAIRS

September 14, 1990

Mr. Paul Curl, Secretary  
Washington Utilities & Transportation Commission  
1300 South Evergreen Park Drive S.W.  
Olympia, Washington 98504-8002

Regarding: REF UT-32126 / DOCKET NO. 900726, 900733  
[Proposed WAC's Effecting Hotels/Motels & Guest L.D. Charges]

Dear Mr. Curl,

I have been in the hotel/motel business in the State of Washington since 1957. I'm a certified hotel administrator and have managed properties large and small. I own two small motel properties and an recreational vehicle park in Spokane County. I'm very experienced with hotel/motel/r.v. guest long distance and local phone use.

The intent of your "WAC" outline is admirable but, if I understand it correctly, when you place all hotel/motel/r.v. park **PBX systems** under the category of Alternative Operator Service Companies, you do us a dis-service. Judge Green's continuing rulings and intent was and is to allow for a competitive playing field.

The application of these regulations will effectively roll back Judge Green's intent to allow every small business the opportunity to purchase or lease equipment that was not available under the "old" monopoly system held by A T & T, U.S. West and GTE. The small motel has available to it equipment that allow guests to purchase access lines [AT&T or otherwise] that allows our guests to make calls for less money than the current rates charged by the monopolies. If you hamper us by requiring more exotic equipment than we already have, you will force us back into the arms of the A T & T's and others.

I will note specific concerns as follows:

1. If we purchase lines (800 outgoing or otherwise) and charge our guests when they use these lines, are we now an AOS Company? **We currently charge 29¢ per minute for our guests calling from Spokane to Seattle, the U.S. West rate from a motel to Seattle is 49¢. Who is normal, their rate or mine? Why will my guests have to use U.S. West rather the inter-tie I have contracted with Northwest Telco for?**
2. On Page 5, Item B; If I understand the material correctly, it implies to me that I must charge for access to 800 Numbers, we do not and on Page 8, Item D, you state we are not to charge for this access. This is confusing.
3. On Page 7, Item 4-A, I would suggest that rather than apply a stick on message to the phone (it looks terrible quickly) I

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would suggest that we provide information to our guests just as the local phone company does, by way of using the phone book in the guest room. I apply a very detailed set of instructions to all my guests. When the book is dog-eared, we replace the book with the instructions on the face of the book.

4. As to the concern with who is my supplier. My guests are not concerned with this factor; they want to know and are advised as to what the charge will be when they use MY system rather than the monopolies. I for one would like to have all area code rates made available to every motel/hotel/r.v. etc. by the local phone company so our guests would know immediately or next to it when rates change. **We advise our guests on the face of the phone book, all Long Distance Calls at 29¢ per minute until after hours or on holidays when it goes to 23¢ per minute. We do not charge any access fee, in fact we don't charge for local calls, we are not in the phone business, we provide this service at a very minimal rate to offset most of our costs, not make a profit on phone calls.**
5. If you hold us responsible for our rates when compared with the "normal" AT&T or U.S. West Rates; I would suggest that the large monopolies be required to provide us with current information on any and all rates in a timely manner at their cost. It is my concern that this effort implies an effort to drive us back to a monopoly arrangement again. Page 8, Item E..
6. Page 9, Item A. Our DD phone systems are designed to provide our guests with total privacy. Unlike the old cord board, we cannot intercept our guests calls nor can we stay on the line and monitor their calls. If you require this, our equipment will be obsolete and could require we go back to the AT&T or U.S. West companies for leased equipment like in the old days.
7. Page 9, Item (ii). Our guests know they have several choices only they can make. First if they want to save money, they can use our system and charge the call to their room. We provide the with the day/date/time/length of call and number called and the charge and wo intiated the call. If they prefer to call on any calling card, third party or collect or by any system they like, they only have to follow the instructions on the phone book. I have to ask the simple question, why do we have to tell our guests that if they use our phone system rather than some other system that we will charge them, a simpleton must understand this. If you use a service, you have to pay for the use of same.

**Also:** If you require we provide voice activated messages in advance of all calls; you will effectively obsolete all small motel PBX systems, increase the cost of the service and drive us back into the arms of the monopolies.

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Page Three:  
WUTC Regulations  
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8. Page 10, Item D. If you check on U.S. West and AT&T, I don't believe that they achieve this now. When our guests touch 9 then 0 and wait, this direct dial to the operator (local phone company) it is my experience that this takes longer than 10 seconds. It is not an excessive long wait but still longer than 10 seconds and the firm answering is U.S. West.
9. Page 11, Item C. When the normal home has a phone that requires three strokes to access help (911) - **why in the name or normalcy would we be required to provide a service of only ONE STROKE to access help?** In all hotels/motels etc. that I'm familiar with, you have to touch 9 + 911 to access the local emergency line. If you require all AOS's (and you identify us as being an AOS) to have ONE STROKE CAPACITY FOR 911, you will obsolete all the current PBX systems or at minimum cause a great deal of investment in new equipment to change what is the norm at this time.
10. Page 11, Item D. Second paragraph: "No charge shall be levied (imposed) for the emergency call. **I believe you must identify what is an emergency call.** When the visitor or traveller is concerned about the kids at home etc.. is this an emergency call and is the Long Distance Call free? It isn't with the local phone company. I believe that when you bring the motel/hotel/r.v. park into the circle for discussions, you have to be specific as to what would the local phone company do under the same circumstances. They charge for all long distance calls except 800 numbers. That is what we do also.

I thank you for reading this manuscript. It is not as lengthy as yours but does try to direct your attention to concerns I have of your sixteen pages plus the cover letter. **I too am concerned with excessive and usury charges levied by un-scrupulous firms, be they in my industry or otherwise. However, I for one would not stay in any property that gouged me on a phone call, the market should be allowed some opportunity to correct this greed.** I would hope you will be able to enlighten me as to whether or not I will have to replace all my equipment and if so how I should finance this change over.

Sincerely,



R. Terry Lynch, CHA/Owner  
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The Shamrock Motel  
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CC:  
Washington State Hotel/Motel Association  
Inland Empire Innkeepers Association

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