

1 BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

2 GTE NORTHWEST INCORPORATED, )

3 Complainant, ) Docket No.

4 v. )

) COMPLAINT

5 UNITED & INFORMED CITIZEN )

6 ADVOCATES NETWORK, )

7 Respondent. )

8 Complainant GTE Northwest Incorporated (hereafter, "GTE") hereby avers and alleges as its  
9 complaint under RCW 80.04.110 as follows:

10 I. PARTIES

11 1. GTE is a telecommunications company, as defined in RCW 80.04.010, providing  
12 telecommunications services in the State of Washington. GTE's telecommunications services  
13 relevant to this complaint are regulated by the Washington Utilities and Transportation Commission  
14 (the "Commission").

15 2. Respondent United & Informed Citizen Advocates Network (hereafter "Respondent"  
16 or "U&I CAN") is a telecommunications company, as defined in RCW 80.04.010, providing  
17 telecommunications services in Washington. Upon information and belief, Respondent has not  
18 registered with the Commission to provide telecommunications services.

19 3. As required by WAC 480-09-420(5)(b), GTE alleges upon information and belief that  
20 the address for the registered agent of Respondent is:

21 Mr. Clell W. "Bill" Loveless  
22 6947 Coal Creek Parkway SE, # 224  
23 Newcastle, WA 98059-3159

1           4.       As required by WAC 480-09-420(5)(b), GTE alleges upon information and belief that  
2 the address for Respondent's attorney is:  
3               Mr. J. Byron Holcomb  
4               9596 Greenspot Place NE  
5               P.O. Box 10069  
6               Bainbridge Island, WA 98110

6 II. GROUNDS FOR RELIEF

7           5.       GTE provides, among other services, basic local telephone service. GTE provides  
8 local service to areas defined on maps on file with the Commission. Each such area is defined as an  
9 exchange. All GTE customers are entitled to place unlimited numbers of calls within their exchange  
10 for a flat monthly charge.

11          6.       GTE also provides extended area service ("EAS"). Under EAS, when various  
12 exchanges are considered to have a sufficient community of interest with other adjacent or nearby  
13 exchanges, customers in those exchanges will be permitted to make unlimited calls to persons in  
14 those exchanges for a (slightly higher) flat monthly charge.

15          7.       GTE also provides intraLATA interexchange service. Calls placed to customers  
16 within a LATA, but outside the customer's exchange or EAS area, incur usage-based charges. For  
17 such calls terminating in GTE's exchange, GTE charges the carrier set terminating access charges.

18          8.       U S WEST Communications, Inc. ("USWC") also provides local and EAS service. In  
19 at least two instances, GTE's EAS areas, as defined by the Commission, overlap with USWC's EAS  
20 areas. Specifically, GTE's Halls Lake and Bothell exchanges are covered by EAS areas which  
21 include USWC's Seattle exchange, as well as other GTE exchanges to the north.

22          9.       Respondent offers a service whereby, for example, subscribers in Seattle may call a  
23

1 telephone number in GTE's Halls Lake exchange and have such call bridged to GTE's other  
2 exchanges covered by the Halls Lake EAS area. This service is referred to as "EAS bridging."

3 10. This Commission has held that EAS bridging service violates the statutes, rules and  
4 regulations governing telecommunications in this state. Re U.S. MetroLink Corp., Docket No. U-  
5 88-2370-J, Second Supplemental Order, 103 PUR 4th 194 (1989). This Commission has held that  
6 parties offering EAS bridging must instead pay appropriate access, toll or other charges. In the  
7 Matter of the Complaint of GTE Northwest Incorporated, Docket No. U-89-1719-F, Third  
8 Supplemental Order Approving Settlement, May 2, 1990.

9 III. RELIEF REQUESTED

10 11. GTE respectfully requests that the Commission:

- 11 a. Order Respondent to properly register with the Commission;
- 12 b. Cease providing EAS bridging service or in any other manner evading or  
13 avoiding proper toll or access charges; and
- 14 c. Award GTE back toll and/or access charges in an amount to be determined  
15 through this proceeding.

16 Respectfully submitted this \_\_\_ day of February, 1997.

17 GTE NORTHWEST INCORPORATED

18 \_\_\_\_\_  
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