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January 30, 2001

Carole Washburn, Executive Secretary  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive SW  
Olympia, Washington 98504-7250

Attention: Bob Shirley  
Re: Docket No. UT-003074

Dear Ms. Washburn:

Qwest makes this filing pursuant to the Commission's January 9, 2001 "Notice of Opportunity to File Written Comments," regarding rules relating to the Washington Telephone Assistance Program ("WTAP").

Qwest appreciates the opportunity to provide comment on the existing tariff rules in Chapter 480-122. We commend Staff for their review and effort to streamline these rules in accordance with the Governor's Executive Order, 97-02.

Qwest generally concurs with the changes and deletions proposed by Staff. Qwest strongly supports the proposed rule language in WAC 480-122-020, as it appears to expand the base of carrier participation by holding all carriers accountable for the same requirement of an assistance program. However, Qwest recommends modifying the third sentence as follows:

Every local exchange company must offer the telephone assistance rates and discounts in accordance with RCW 80.36.410 through 475 when such companies offer residential service.

Qwest respectfully submits that all carriers, Incumbent Local Exchange Carriers (ILEC's), Competitive Local Exchange Carriers (CLEC's) and resellers providing services within the state of Washington should be held equally responsible for the regulatory requirements of a WTAP program. RCW 80.36.410 identifies universal telephone service as an important policy initiative of the state. The policy is designed to address concerns about the ability of low income persons to continue to afford access to local exchange telephone service. The policy further states, it is in the

public interest to mitigate the effects changes in the telecommunications industry have on low income individuals. Furthermore, RCW 80.36.450 limits the program to one residential access line per household.

Contribution to the WTAP program should not be solely born by ILEC customers but rather should be supported by all carriers providing residential service. It is inappropriate to preclude low income subscribers from the right to obtain telephone service from a provider of their choice, when such choice exists. Therefore, Qwest respectfully suggests all providers should be obligated to offer service in compliance with the state statues.

If you have any questions regarding Qwest's comments in this matter, please do not hesitate to contact me at (206) 345-5921.

Sincerely,

Lisa Espinosa