

CR-101 Comment Summary

Written comments in response to the CR-101 were received from:

1. Joint CLECs (AT&T, TCG, Integra, XO) from Gregory J. Kopta
2. Qwest Corporation from Mark Reynolds
3. Verizon Northwest Inc., from Robert A. Millar
4. Trans National Communications International, Inc., from Cameron Nance

Joint CLECs

The Joint CLECs recommend that the commission

1. repeal existing rules governing price lists for competitively classified companies and services
2. modify existing rules governing filing of contracts for competitively classified companies and services, and
3. not adopt rules relating to new statutory provisions establishing interim requirements

Qwest

- Qwest filed extensive edit suggestions similar to what staff is recommending unless noted otherwise in the draft revisions.
- Qwest comments support the vast majority of staff's recommended edits. Qwest agrees with other comments and staff that it is not necessary to have rules for the interim requirements governing notices.
- Qwest concurs with staff in recommending that contracts for competitive services should no longer be required to be filed.
- Qwest proposed deleting the requirement to keep competitive rates, terms and conditions on a Web site, but upon discussion, staff believes that by continuing that requirement in a manner similar to the FCC's rules at CFR 42.10 the commission will offer the competitive industry amenable rules.

Verizon

Verizon generally supports many of the same outcomes as staff, Qwest and Joint CLECs. Verizon did not offer specific rule language.

Trans National

Trans National applauds relief from the price list filing requirement but suggests that regulatory fees should be concomitantly reduced or eliminated. Staff notes that regulatory fees are beyond the scope of a rulemaking to implement legislative direction to eliminate price lists.