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October 19, 1990

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Mr. Paul Curl, Secretary
Washington Utilities
and Transportation Commission
1300 S. Evergreen Park Drive, S.W.
Olympia, WA 98504

Docket No. UT-900726
Docket No. UT-900733

Dear Mr. Curl:

Public Counsel supports the proposed rules relating to pay telephones and alternative operator services and will only briefly address several issues in its comments. Telephone users have been the victims of both confusion and numerous abuses as the marketplace for pay telephones and alternative operator services has evolved. The brief history of these industries has amply demonstrated that competition alone will not adequately protect consumers. It has shown that detailed rules governing business conduct are necessary to adequately protect the consuming public. In the absence of total prohibition, which may be in the public interest, these rules should help to improve the protection of telephone users.

Proposed WAC 480-120-138:

The proposed language appropriately places a cap upon the charge for directory assistance. However, Public Counsel submits that there should also be a similar cap placed upon the charge for a local call. Pay telephones serve a variety of purposes for the consuming public, many of which are non-discretionary or emergency in nature. We do not believe that there is any public purpose served by allowing a COCOT to charge a higher rate than the local exchange company.

Proposed WAC 480-120-141:

Public Counsel submits that the proposed changes to this section which detail the responsibilities of the alternative operator service companies are badly needed and should greatly assist in the protection of the public. In particular, the establishment of rate caps for commissions or surcharges, as well

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as for the provision of alternative operator services should help to end some of the most serious abuses in the industry.

We are very hopeful that the adoption of those proposed rules will help to end the confusion and the abuses in this industry. Thank you for your consideration of these comments.

Sincerely,

Charles F. Adams
By *S. Morrow*
CHARLES F. ADAMS
Assistant Attorney General
Public Counsel Section

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