

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**U-991301**

In the rulemaking re Utilities	)	
General – Tariffs, Price Lists,	)	COMMENTS OF SPRINT
and Contracts; and Customer	)	
Notice	)	

Sprint Corporation, on behalf of United Telephone Company of the Northwest and Sprint Communications Company L.P., offers the following comments in response to the July 24, 2001, "Notice of Opportunity to File Written Comments" in this docket.

First of all, Sprint appreciates the Staff's clarifications and modifications of the proposed tariff, price list, and contract rules in response to earlier comments.

Sprint has one remaining concern with the current draft of the customer notice rules. WAC 480-120-04X would require the company to notify "each affected customer" about any hearing in an adjudicated proceeding that might take testimony from the public.

Certainly the public has a right to participate in and be informed about Commission decisions. However, under WAC 480-09-400(5)(b), it is the Commission's responsibility to provide hearings notice to interested parties, not the company's.

Moreover, pursuant to RCW 80.01.100 it is the duty of the Attorney General (Public Counsel) to represent and appear for the people of the state of Washington. In an adjudicative proceeding, Public Counsel may call on members of the public to testify. Beyond that, either agency may call a special public meeting "by delivering personally or by mail written notice to each member of the governing body; and to each local newspaper of general circulation and to each local radio or television station which has on file with the governing body a written request to be notified of such special meeting or

of all special meetings [RCW 42.30.080]. Sprint therefore believes it is inappropriate to place a new burden and expense on the companies to notify the public of the Commission's activities in still another manner. If the Commission want to take the additional step of notifying each consumer directly, a listing of customer addresses would be readily available from the company through the normal discovery process.

A practical problem with this proposal is that Sprint and other large companies generally need two to three months lead time to get a customer notice into the billing cycle. There are many demands on the limited bill and envelope space. To provide 45 days notice of a hearing would require, then, that the hearing date be set at least four and a half months in advance. This extra lead-time will unnecessarily increase regulatory delay.

Because of these issues, the proposed rule falls short of the goal of revising the rules in light of "need, effectiveness, efficiency, clarity, intent and statutory authority, cost and fairness, and consistency with laws and policies. Specifically, it would add one more form of notice without a demonstrated need, would make the regulatory process less efficient by increasing regulatory delay, and is inconsistent with existing law regarding the duties of the Commission to notify the public about a hearing.

Finally, Sprint requests that the stakeholder workshop tentatively scheduled for August 23, 2001, be held in order to provide opportunity for further discussion of these proposed rules.

Respectfully submitted this 14<sup>th</sup> day of August, 2001, by

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Nancy L. Judy – State Executive  
External Affairs