

August 14, 2001

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

Re: Tariff Rulemaking Docket No. U-991301

Dear Ms. Washburn:

Pursuant to the Notice of Workshop and Opportunity to File Written Comments dated July 24, 2001, WorldCom, Inc. (WorldCom) submits the following comments on the latest draft of the Customer Notice Rules.

CUSTOMER NOTICE RULES

WorldCom refers to its previously filed comments on May 31, 2001 regarding the requirement of customer notice for price decreases under proposed rule WAC 480-120-X15. First, this requirement forces additional and unnecessary costs of doing business in WA and provides no benefit to customers. Second, in addition to the monetary costs associated with providing direct notice of decreases, the Commission should take into account the fact that space on bill inserts is quite limited, particularly where billing is accomplished through the local exchange carrier. In fact, if information about price decreases is required, then other more useful information may be lost. Finally, because the most economical customer notice allowed requires several months lead-time, customer's decreased rates are delayed. While WorldCom is committed to providing its customers with information about their services, customers are not harmed by price decreases, and thus there is no need for any type of advanced notice in this area. In this regard, WorldCom submits that customers would prefer to learn of price decreases through seeing lower rates on their bills than risk minimizing or eliminating such decreases because of the imposition of additional notice requirements. WorldCom therefore believes that the rule should be changed to eliminate the price decrease notification requirement.

CUSTOMER VERIFICATION AND ASSISTANCE

WorldCom objects to providing the number of customers affected by price list changes. This information is not maintained on a state-specific basis by all WorldCom entities. However, to the extent that the Commission should include a requirement to verify the number of customers affected, WorldCom requests that any information supplied to the Commission be treated as proprietary and confidential.

CONCLUSION

WorldCom appreciates the opportunity to submit written comments on these proposed rules and thanks staff for the effort that has gone into this rulemaking. Please contact me with any questions or comments.

Sincerely,

Joan M. Stout
Compliance Manager
Worldcom, Inc.
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