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GTE Northwest Incorporated

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October 18, 1990

Mr. Paul Curl  
Secretary  
Washington Utilities and  
Transportation Commission  
Chandler Plaza Building  
1300 S Evergreen Park Drive SW  
Olympia, Washington 98504

Dear Mr. Curl:

ALTERNATIVE OPERATOR SERVICES PROPOSED RULEMAKING DOCKETS  
UT-900726-R/UT-900733-R

GTE Northwest, in general supports the revisions to Commission Rules regulating Alternative Operator Services. GTE Northwest believes that these proposed rules will benefit Washington consumers overall, and will help to benefit the operation of GTE Northwest's local exchange business. Customer complaints should be diminished if these rules are enacted and competition in this area of telecommunications services will go forward on a more level ground.

However, GTE Northwest has several concerns and suggested corrections to the Commission's proposed rules which it would like the Commission to consider. They are:

- No. 1      Local Exchange Company Enforcement  
Proposed WAC 480-120-138(18) places responsibility upon the local exchange company to assure that Alternate Operator Service Providers abide by the Commission rules and tariffs. It imposes a "duty" to enforce the terms and conditions of such rules and tariffs. While GTE Northwest will take action to see that its Alternate Operator Services subscribers are aware of and agree to abide by such rules it does not believe it is appropriate to impose upon it a more pro-active enforcement responsibility. As violations are brought to GTE-NW's attention it would notify the pay phone owner and follow-up to ensure that corrective action has been taken. Thus it would like clarification from the Commission with respect to any additional enforcement

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obligations other than that. The Commission has the responsibility to enforce its Alternate Operator Services rules and indeed has proposed in WAC 480-120-142 exactly how it would do this. We believe that paragraph 480-120-138(18) should be modified to refer to new WAC 480-120-142 which describes the Commission's enforcement mechanisms.

- No. 2     Printing - Instruction Cards  
Proposed WAC 480-120-141(3)(a) calls for revision to prior telephone instrument posting rules. GTE-NW has incurred over \$5,000 in printing costs in past 6 months to print up these new instruction cards and has incurred additional costs in order to visit each pay phone and change instruction cards. GTE-NW is reluctant to incur costs particularly where the change in wording will not clarify the situation for the consumer. Technically the proposed wording change is erroneous. The operator may not be able to connect the customer with the carrier of his/her choice. Such operator may only be able to instruct the customer how to dial the desired carrier.

Furthermore GTE-NW has problems with the proposed revision to WAC 480-120-141(3)(b)(i) which would require GTE-NW to change the information on the pay phone as often as the pay phone presubscription is changed. GTE-NW receives from a dozen to several hundred carrier change orders a day and would find it very burdensome to post the requested information on the instruction cards in a legible format on a current basis given the turnover in presubscription.

- No. 3     GTE-NW would propose that paragraph WAC 480-120-141(3)(c) be amended to read "access to any registered interexchange carrier providing access from the point of caller origination".

It also proposes that paragraph 480-120-138(7)(d) be revised to indicate that there shall be no charge "to the calling party by the call aggregator or the AOS". The local exchange carrier will not know whether a specific call to an AOS access number is an emergency. All such calls will be included in the bills to the AOS or call aggregators for usage. Therefore the call aggregators or AOS should ensure that the proper credit is achieved.

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- No. 4      WAC 480-120-138 9(c)  
The requirement to disclose surcharges on the instrument would impose a burdensome responsibility on a local exchange companies such as GTE-NW because such surcharges are negotiated between the site provider and the AOS without GTE Northwest's involvement or knowledge. If this requirement is allowed to stand, AOS providers should be required to notify local exchange companies of the surcharges in effect on specific pay phones to allow the local exchange companies to provide the necessary posting.

GTE-NW appreciates the efforts the Commission has undertaken to regulate AOS providers and hopes that it will approve the rules with the suggested revisions above.

Very truly yours,

  
Fred Logan  
Director - Regulatory Affairs

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