

January 31, 2001

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

Re: Docket No. UT-003074 - Rules relating to Washington Telephone Assistance Program

Dear Ms. Washburn:

These comments are submitted on behalf of the Washington Independent Telephone Association (WITA). WITA recognizes that the call for written comments requested the comments be filed by January 30, 2001. WITA respectfully requests that the Commission consider these comments even though they are filed a day late.

WITA generally supports the changes made to Chapter 480-122 WAC, with one exception. That one exception is the sentence that is added to the end of WAC 480-122-020 that "Radio communications service companies may offer the telephone assistance rates and discounts."

It is WITA's position that radio communications service companies should not be able to offer services that are supported from the WTAP fund until such time as radio communications service companies collect and remit monies to that fund. The WTAP statutes need to be modified to require radio communications service companies to collect and remit funds to the WTAP.

There is an exception to the foregoing. A radio communications service company that is designated as an eligible telecommunications company (ETC) for receipt of federal universal funds should be required to offer telephone assistance rates and discounts. As a condition of receiving or continuing ETC status, participation in the WTAP (including collection and remission of the WTAP payments on the same basis as wireline companies collect and remit to WTAP) should be required. The Commission has authority to impose this requirement as a condition of ETC status.

Thank you for your consideration of these comments. As requested in the call for comments, the original plus ten copies are filed as well as an e-mail copy in the requested format.

Sincerely,

TERRY VANN

/km
Enclosures