

Lida C. Tong
Director
Regulatory & Governmental Affairs



GTE Service Corporation

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July 28, 2000

Mail Code: WA0101RA

Ms. Carole J. Washburn, Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Subject: **AMENDMENT TO PETITION FOR WAIVER OF PAY PHONE
AND OPERATOR SERVICES RULE – UT-990401**

Enclosed for filing is an original and nineteen copies of Verizon Northwest Inc.'s amendment to its petition filed on March 4, 1999 in the above referenced docket. Verizon is seeking a waiver from certain provisions of the requirements of WAC 480-120-141(2)(b).

Please direct any questions to Joan Gage at 425-261-5238.

Very truly yours,

Lida C. Tong
Director – Regulatory & Governmental Affairs

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Enclosure

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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

REQUEST FOR AMENDMENT TO) Docket No. UT-990401
WAIVER OF CERTAIN PROVISIONS) AMENDMENT TO PETITION
OF WAC 480-120-141(2)(b)) FOR WAIVER

Verizon Northwest Inc. (Verizon), previously known as GTE Northwest Incorporated, hereby petitions the Washington Utilities and Transportation Commission (Commission) for an amendment to its previously filed waiver of WAC 480-120-141(2)(b).

On December 29, 1998, the Commission filed with the Code Reviser the Rulemaking for Pay Phone and Operator Services Providers. This state regulation was intended, in part, to implement consumer protections regarding pay phone use. On March 4, 1999, Verizon filed a request for a waiver of certain requirements of the rule because it did not have the technology to comply with all the requirements. The following language is the subject of this petition:

(2) Disclosure

(b) Verbal disclosure of rates. Before an operator-assisted call from an aggregator location may be connected by a presubscribed OSP, the OSP must verbally advise the consumer how to receive a rate quote, such as pressing a specific key or keys, but no more than two keys, or by staying on the line. This message must precede any further verbal information advising the consumer how to complete the call, such as to enter the consumer's calling card number. This rule applies to all calls from pay phones or other aggregator locations, including prison phones and store-and-forward pay phones or "smart" telephones. After hearing an OSP's message, a consumer may waive their right to obtain specific rate quotes for the call they wish to make by choosing not to press the key specified in the OSP's message to receive such information or by hanging up. The rate quoted for the call must include any applicable surcharge. Charges to the user must not exceed the quoted rate.

The Commission has never acted on the Verizon petition.

The Company has now ascertained that it can complete the changes necessary to comply, in part, on or before September 1, 2000. Once the changes are implemented, consumers using Verizon pay phones will be able to reach a live operator for the rate quote by pressing a key.

However, concerns associated with service to inmate populations in prisons require that Verizon petition for a permanent waiver of the rule requirements for pay phone service to inmates. Due to security concerns raised by penal authorities and others, as well as fraud prevention concerns on the part of correctional facilities and Verizon, there should be no circumstance under which an inmate should have access to Verizon's live operators. However, the only technically feasible way for Verizon to fulfill the verbal disclosure obligation requires referral to a live operator. Therefore, Verizon requests a permanent

waiver of that portion of the rule requiring rate disclosure to the party originating the operator assisted call, under almost every circumstance this would be a "collect" call, when that call originates from an inmate phone at a penal facility. In the interest of narrowing this waiver request as much as possible, Verizon would still make the verbal disclosure option available to the person receiving the operator-assisted call.

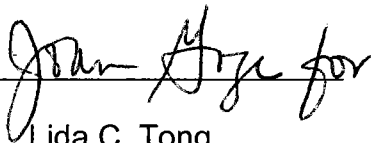
As of the end of June 2000, there are 3,997 Verizon owned pay phones in the state of Washington. Of these, only 233, or approximately 5.8%, are Verizon pay phones located in inmate locations for which a permanent waiver is requested.

CONCLUSION

Accordingly, Verizon requests the Commission approve an amendment to its original waiver petition effective from the date of the original petition to September 1, 2000. Additionally Verizon requests a permanent waiver of the requirement of WAC 480-120-141(2)(b) for verbal disclosure to the originating party on all calls originated by inmates.

Respectfully submitted this 28th day of July 2000.

Verizon Northwest Inc.

By 
Lida C. Tong

Director – Regulatory &
Governmental Affairs

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ITS ATTORNEY

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RECEIVED
PETITION



WT-990401
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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

March 4, 1999

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
P.O. Box 47250
Olympia, Washington 98504-7250

Dear Ms. Washburn:

Subject: **PETITION OF GTE FOR A WAIVER OF PAY PHONE AND
OPERATOR SERVICES RULES – DOCKET NO. UT-970301**

Enclosed for filing is an original and 19 copies of a petition for a waiver of WAC 480-120-141(2)(b) and 480-120-141(7)(a). GTE is seeking a waiver from these rules because the technology is not currently available to comply with these requirements.

Please contact Joan Gage on 425-261-5238 if you have any questions.

Very truly yours,

Lida C. Tong
Director – Regulatory & Government Affairs

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Enclosure