

October 23, 2001

Ms. Carole Washburn
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive
Olympia, WA 98504-7250

Re: Docket #UT-991301
Chapter 480-80 and 480-120-196

Dear Ms. Washburn:

WorldCom, Inc. ("WorldCom") submits the following comments in response to the Notice of Opportunity to File Written Comments Extension issued October 10, 2001 in the above-referenced docket.

480-80-202 Interpretation and application of price lists

WorldCom objects to subsection (2) regarding the outcome of disputes when ambiguity is found in the price lists. The current draft states that "if the Commission determines that a telecommunications company's price list or other offer of service is ambiguous or conflicts with other offers, it will construe the conflict or ambiguity in favor of the customer." This statement is unfair to carriers and not necessary. The Commission already has rules covering customer disputes, and ANY dispute regardless of whether there is a perceived ambiguity in the price list should be handled fairly by weighing all the facts and the situation at hand.

Subsection (2) is a matter of customer service, which is a major factor in a competitive company's market strategy. Customer service plays a major role in how a competitive company chooses to handle all of its customer concerns, including alleged ambiguities in its price list. The level of customer service delivered directly affects a strong customer base; therefore, subsection (2) is not necessary and should be deleted.

480-80-206 Price List Availability to Customers

WorldCom, Inc. maintains its objection to subsection (1) and states that this provision to post price lists on a web site should be voluntary for competitive companies. However, if the Commission decides to include this new requirement, carriers should be given adequate time to develop a working web site for this purpose. WorldCom requests that carriers should be allowed at least one (1) year from the date of the adoption of such a rule to make necessary arrangements.

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WAC 480-120-196 Customer notice requirements--Competitively classified telecommunications companies or services.

WorldCom, Inc. has no further comments on this chapter, but continues to advocate its points in previous comments filed in this docket.

WorldCom appreciates all of the Commission staff's efforts on this rulemaking and welcomes any questions on these comments.

Sincerely,

Joan M. Stout
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