

From: Keith C. Hall
5619 Oceanview Blvd NE
Bremerton WA 98311
206-684-1571 (work)

I called US West to order telephone service for a newly-purchased residence. Phone service was still in operation on two lines in the home (the seller had not discontinued service). I ordered service for two lines to be connected, and US West indicated that it would be no problem to begin service on August 7th, as had been requested.

US West later called to inform me that service would not be available because the telephone access lines for that house had been reallocated to someone else after the seller had discontinued service. They stated that an engineer would have to perform a site inspection and assess the situation within 4 business days (i.e. August 10th, 3 days after service was to begin). They could provide no estimate of when service would be initiated, and they could not explain why they had no policy that would ensure each household at least one line of service. I have previously had service with SBC/Southwestern Bell (numerous connections), SBC/Pacific Bell, BellSouth, GTE, and TelMex. I now add US West to that list, and my personal experience thusfar, along with media reports, have led me to believe that US West service will be roughly equivalent to what I experienced with TelMex. All other providers, on the other hand, were able to meet their connections on time and provided consistently reliable service following the connection. In one case SBC/Southwestern Bell had minor difficulties installing a second line into my home; however, they provided a repair technician to my home THE SAME DAY (working continuously part of two days until the connection was successful).

The level of service provided by US West is unacceptable. They cannot meet the connections on time, and they cannot provide technical support within a reasonable time. I assure you, this poor quality service is not having just a personal impact. In an area so dependent on trade and high-tech employment, this will surely have profound economic impacts if such poor service reliability continues.

Telephone service should be consistent and reliable. Residents, business, public, and health institutions depend on service. If US West cannot make the appropriate investments into its communications network to ensure service, perhaps US West should be encouraged to merge with an experienced local provider. One could only hope that the acquisition of US West by Qwest will improve the situation, but Qwest is a relatively new company with little experience in the local consumer telephone market. Moreover, the State of Washington should consider full open market access by other telecommunications providers as a means to remedy this problem. In the absence of choices, however, some level of consumer protection must be provided to ensure that telephone services are provided in Washington and throughout US West territories. In short, US West must be held accountable for inappropriate business practices and poor decisions it makes regarding its communications infrastructure.

Considerations for language in the Telecommunications Rulemaking process could include (please note that language should not specify a single company, US West, as is written in my suggestions):

SERVICE CONNECTIONS

At a minimum, US West should provide telephone services within 5 business days of a request being made with 95% reliability. When placing an order, both business and residential customers should be confident that service will be available.

If US West fails to provide service on the scheduled date due to technical difficulties (including cases where US West calls the customer to delay start of service), US West should provide a definitive date to the customer for start of service. Service should not be delayed beyond 7 working days of the initial start date of service, allowing sufficient time for US West to obtain parts, install infrastructure, etc. to ensure service availability.

US West should ABSOLUTELY GUARANTEE that each business and each residence

are guaranteed at least ONE telephone line. ***I requested two lines; however, I should be given access to one line until such time as the second line can be installed--and I should not have to waive access to telephone service entirely to allow another home access to a second line.***

If US West fails to provide telephone service within 10 working days of the original start of service date, US West should credit the consumer with amount equal to installation charges (i.e. the consumer should not have to pay for service installation). If US West fails to provide telephone service within 20 days of the original start of service date, US West should credit the consumer with an amount equal to installation charges and the first month of service at full cost (i.e. excluding promotions)--furthermore, US West should be penalized by the state an amount of \$100 per connection that it fails to provide within 20 days of the original start of service date.

SERVICE RELIABILITY

Businesses and residents should be reasonably assured that telephone service, once connected, will be available to them. If US West is liable for any blackouts or service disruptions more than one hour in duration, consumers and business customers shall be credited an amount equal to 1/15 of the cost of their base and optional costs PER DAY of the occurrence for each line affected. If the number of individual service disruptions is greater than _____ in any given month within the State of Washington, US West will be fined \$1 per service disruption (greater than one hour).

In the event of a medical or other non-disaster emergency during "routine" telephone blackouts that prevents telephone access, US West may be held liable for damages related to public and private costs of health care or emergency response. [might want to work on this language]

COMPETITION

The State of Washington should consider full open market access to competing telecommunications providers as a means to remedy this problem. Urban and rural market regions could be designed as overlays to existing networks, allowing market-based competition while ensuring that residents in both urban and rural areas have full access to telecommunications choices. Freedom of choice is ultimately the best mechanism to ensuring service reliability.

Please consider these requests carefully. US West may undertake a lobbying effort to limit its accountability; however, legislators must remember that a long-term economic impact is inevitable if telephone service in this region is not made more reliable.

Keith C. Hall