

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION
COMMISSION

In re Application of U S WEST, INC. and)	DOCKET NO. UT-991358
QWEST COMMUNICATIONS)	
INTERNATIONAL INC.)	COMMENTS OF SPOKANE
)	NEIGHBORHOOD ACTION PROGRAMS
for an Order Disclaiming Jurisdiction, or in)	
the Alternative, Approving the U S WEST,)	Re: Qwest's Petition for Modification and
INC. -- QWEST COMMUNICATIONS)	Mitigation
INTERNATIONAL INC. Merger)	
.....)	

The Low Income Telecom Project of Spokane Neighborhood Action Programs (SNAP) respectfully submits these comments regarding Qwest's PETITION FOR MODIFICATION OF NINTH SUPPLEMENTAL ORDER AND MITIGATION OF CREDIT AMOUNT. SNAP thanks the Commission for this opportunity to comment.

We are struck by the seemingly unassailable logic of Qwest in its skillfully crafted petition. It is argued that the 100 percent standard can never be reached. It is asserted, Qwest may reallocate resources to other sectors if the standard of service threshold is not lowered. A 60 percent performance standard is mentioned. An unwelcome outcome can only be avoided by yielding to Qwest.

Nonetheless, we are left with questions. If the 100% standard can never be achieved, why did Qwest initially approve it in the Settlement? We can only speculate on the motives for agreeing to a provision that according to Qwest can never be attained, as given the skill of Qwest's counsel it surely cannot have been an oversight. We ask, isn't customer satisfaction and customer goodwill sufficient motive to strive for complying with the current standards? Will such considerations fall by the wayside if Qwest's petition is denied?

If we look at the table located on page 6 of Qwest's Petition we see that in the month of June 2001, when Qwest's compliance rate was 99.50 percent, there were still 102 households or businesses that did not have basic phone service for over two days. That is over two days without communication access to emergency and other essential services. Such a lack of access is all the more devastating to those operating a business, those who are disabled, have no transportation, are experiencing domestic violence, are expecting responses to employment or housing applications, or are alone and isolated. In our view, one household or business without basic phone service is one too many.

Hence, we oppose the lowering of the standards and penalty schedule that Qwest initially approved. Qwest voluntarily obligated itself to the standards of service and penalty schedule in question. We find no valid, and suitable, argument that it is in the public interest to reduce the amount of customer credits that will result from the enforcement of the current Service Quality Enforcement Program.

Respectfully submitted this 22nd day of February, 2002

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