



**Zama Networks, Inc** International Gateway Building  
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May 9, 2001

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

RE: Zama Networks, Inc Comments Concerning:  
Docket No. UT-990146  
Telecommunications – Operations Chapter 480-120 WAC

Dear Ms. Washburn:

Zama Networks has one comment that concerns the proposed WAC 480-120-041 (3) and (4). Zama like many other CLEC's provides many of its services under contract. WAC 480-120-041 (3) requires a letter within one week for new service containing information such as the company's address, phone numbers, and the rates terms and conditions for each service. WAC 480-120-041 (4) requires a similar letter within three days for a change to a service.

Zama believes that the letters required in the proposed WAC 480-120-041 (3) and (4) when the services were sold under contract are redundant. The contract for service covers all the items the letters are intended to communicate (with the exception of WAC 480-120-041 (4) (c), which will be addressed later.) Zama Networks, Inc. contends that its customers may even find the letters unprofessional or un-businesslike given the pervious discussions leading up to the contract signing and the detail provided in the contract.

Regarding WAC 480-120-041 (4) (c) the twenty-one day right to dispute changes or addition of new services does not make sense in the context of a signed contract.

Zama suggests the following alternative rule language (added language in *italics*):

480-120-041 (3)

*Except for services provided under contract pursuant to 480-80-035*, each company must provide the customer, within one week from the application date for any new service, a confirming notice or welcome letter that provides, at a minimum:

480-120-041 (4)

*Except for services provided under contract pursuant to 480-80-035*, each company must provide a customer a confirming notice within three business days of receiving a customer request for or making a company-initiated change to a service(s) which results in the addition of a service, a change from one rate schedule to another, or a material change in an existing service. The confirming notice must provide at a minimum, the following information in clear and conspicuous statement:

If you or your staff have any questions, I can be reached on (206)-419-0175.

Sincerely,

D. Tom Maher  
Director, Interconnection - Industry and Regulatory Affairs