

Comments regarding Docket No. UT-003074

Rules relating to the Washington Telephone Assistance Program: Chapter 480-122 WAC

Comments from Grace Moy, Program Manager, DSHS/Division of Assistance Programs

01-30-01

Word 97

I have no comments regarding the proposed rules as written. However, please consider these additions regarding improving access to local telephone service by low income households and increased participation by local exchange carriers.

Issue:

Some customers are not connected with phone service because they may have no credit or have delinquent accounts. Many telephone companies refuse to provide service unless the entire past due amount (generally in the \$100-200 range) is paid in full. Having to save such a large sum of money is a burden for low-income households. These households are especially vulnerable and in need of telephone service as they often include persons who have serious medical concerns or have small children.

Smaller payments over time makes service more affordable. For example, a delinquent amount of \$200 spread over six payments results in a more accessible \$33.33 monthly for initial service.

Suggested wording:

A local exchange company must offer basic local service to eligible customers accepting toll limitation.

A local exchange company must offer basic local service to eligible customers agreeing to pay delinquent accounts in no fewer than six installments. The customer may choose to pay the amount in fewer installments.

Issue:

Many local exchange carriers do not seek ETC designation, possibly because it infers more regulation by UTC. However, without the designation, carriers are not able to request Lifeline/Link Up reimbursement from USAC, thus representing a revenue loss for offering WTAP.

ETC designation is desirable from the customer's standpoint as it ensures that the carrier can at a minimum provide the services cited in the universal service order.

The commission can provide ETC designation for the purpose of offering WTAP.

Suggested wording:

Local exchange carriers may seek commission designation as an eligible telecommunications carrier for the purpose of offering the telephone assistance program.