

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**UT-990146** )  
**UT-991301** ) SUMMARY OF  
**UT-991922** ) COMMENTS OF SPRINT CORPORATION

Because of the magnitude of the changes proposed, Sprint urges the Commission to have several more rounds of drafts and comments before moving on to the CR-101. Sprint also suggests moving some of the more complex issues, such as network performance, local number portability, and unserved areas, to separate dockets so that the Commission has a full record upon which to make informed decisions. As Sprint understands it, this rulemaking was initiated at the request of the Governor. The Commission was asked to re-examine the rules in light of need, effectiveness and efficiency, clarity, intent and statutory authority, and coordination with other agencies. Sprint applauds the Staff for its fine work in improving the clarity of the existing rules. Sprint is alarmed, however, at the number of new rules and requirements that are contained in the draft. The scope of these changes seems to go well beyond the Governor's mandate. The net result would be a radical increase in regulatory burden and expense. The new rules and revisions would impair, rather than improve, the providers' effectiveness and efficiency and would constitute new entry barriers that would likely slow the development of enhanced services and competition in the state. Sprint, therefore, urges the Commission to refrain from imposing new requirements.