

MCI Telecommunication Corporation

ARCO Tower, Suite 3900 707 17th Street Denver, Colorado 80202 303 291 6400 Fax 303 291 6333 Sue E. Weiske Attorney West Division

90 000 10 7 40 06

CTATE COLD DA. UNIL 18 18 TACLEST. COMMISSION

October 18, 1990

Paul Curl
Executive Secretary
WASHINGTON UTILITIES AND
TRANSPORTATION CORPORATION
1300 South Evergreen Park Drive, S.W.
Olympia, WA 98504

Re: Docket No. UT-900726

Dear Mr. Curl:

Enclosed please find the Original and nineteen copies of the Comments on behalf of MCI Telecommunications Corporation in the above-referenced Docket.

We would appreciate acknowledgement of receipt of this document. An additional copy along with a self addressed stamped envelope is enclosed. Would you please date stamp the copy and return it to MCI.

If you have any questions, please contact me.

Sincerely,

Sue E. Weiske

Enclosure

cc: Clyde MacIver, Esq.

Sue E. Weiske

Parties of Record

In the Matter of Amending
WAC 480-120-021,
WAC 480-120-106,
WAC 480-120-138, and
WAC 480-120-141, Relating
to Telecommunications
Companies -- the Glossary,
Alternate Operator Services
Pay Telephones, and Forms
of Bills.

DOCKET NO. UT-900726

## COMMENTS OF MCI TELECOMMUNICATIONS CORPORATION

MCI Telecommunications Corporation (MCI), pursuant to Notice No. WSR 90-19-118 dated September 19, 1990, through its undersigned attorneys, submits its comments in the above-captioned matter.

MCI is a full service telecommunications company registered with the Washington Utilities and Transportation Commission (WUTC). MCI is classified by the WUTC as a competitive telecommunications provider, according to RCW 80.36.320. All of MCI's Washington services are listed in MCI's Washington Price List No. 2, which is filed with and approved by the WUTC. As such, MCI, and other full service interexchange carriers, is different and distinct from alternate operator services companies. To clarify this difference, MCI recommends the following addition to WAC 480-120-021 GLOSSARY:

"Alternate operator services company - any corporation, company, partnership, or person other than a local exchange company or competitive telecommunications company providing a connection to intrastate or interstate long-distance...."

MCI has no other comments on the proposed amendments to these sections at this time. MCI reserves the right to submit reply comments if necessary.

MCI thanks the WUTC for this opportunity to comment on the proposed amendatory sections and requests that it incorporate MCI's recommended addition.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

Sue E. Weiske
William Levis
Suite 4200
707 17th Street

Denver, Colorado 80202 (303) 291-6400

and

Clyde MacIver
Miller, Nash, Weiner, Hager
and Carlsen
4400 2 Union Square
601 Union Street
Seattle, Washington 98108
(206) 684-4413

Its Attorneys

Dated: October 18, 1990

## CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 18th day of October, 1990, true and correct copies of the Comments on behalf of MCI Telecommunications Corporation were sent via United States first class mail, postage prepaid, to the following:

Donald Trotter, Esq.
Assistant Attorney General
WUTC
Chandler Plaza Building
1300 Evergreen Park Drive South
Olympia, WA 98504

Charles F. Adams, Esq. Assistant Attorney General 1300 Dexter-Horton Building 710 Second Street Seattle, WA 98104

Tammy Moran