

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

UT-990146

Rulemaking re Telecommunications -)
Operations, Chapter 480-120 WAC) COMMENTS OF SPRINT

Sprint Communications Company, on behalf of United Telephone Company of the Northwest and Sprint Communications Company L.P., (collectively hereafter “Sprint”), submits the following comments in response to the Commission’s Notice of Opportunity to file written comments in this docket issued May 15, 2001.

WAC 480-120-141(3) Discussion Draft Rules Concerning Operator Service

Providers and Definitions

Verbal Disclosure of Rates - Sprint believes modification of the existing rules is unwarranted. The current rules provide the customer with the choice of obtaining rate information. The Operator Service Provider (OSP) is required to inform the consumer that a rate quote is available and explain how the rate can be obtained *at the discretion of the consumer*. This choice should not be denied the customer in the event that the charges for the call exceed a WUTC benchmark. Many customers want to make a call quickly, and do not want to be inconvenienced by being forced to take the time to listen to a rate notification message, or any message. They simply want to complete the call.

Sprint believes the proposed rule change, which would tie notification procedures to a WUTC benchmark, will result in customer confusion. Customers will not be aware of the benchmark rate levels and will not understand why sometimes they must ask for a rate quote, while other times it is provided for them. Therefore, Sprint opposes the proposed rules change regarding verbal disclosure of rates.

Establishment of Benchmark – Sprint believes OSP rate benchmarks are unnecessary. Customers have many alternatives among long distance providers, as well as wireless providers. Indeed, wireless services are proving to be a popular substitute for wireline OSP services. Typically, rates are not set by Commission rule. Given that this is a competitive service, it is likely that any market-based benchmark will mean that the rule will need to be modified frequently.

If the WUTC does establish a benchmark, Sprint proposes that the benchmark be based on the average OSP rates of AT&T, Sprint and Worldcom, plus 25%, and be adjusted annually by the WUTC. These three large carriers should be representative and limiting the sample to three carriers will ease the administrative burden on the Commission.

Conclusion

Sprint believes the current rules and market conditions create an environment where supplier and consumer interests are balanced. Accordingly, Sprint believes the proposed rule changes are unnecessary and, therefore, is opposed to them.

Sprint thanks the Commission for its consideration of Sprint's recommendations to amend the proposed rules.

Respectfully submitted this 31st day of May, 2001 by

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