

**Comments of Qwest Corporation in  
Docket No. UT-990146  
Chapter 480-120 WAC Telecommunications  
Operator Service Providers and Definitions**

Qwest submits the following comments in response to the Supplemental Notice of Opportunity to File Written Comments and to Propose Alternative Rule Language on Draft Rules Concerning Operator Service Providers and Definitions for Chapter 480-120 WAC issued May 15, 2001.

**Discussion Draft - WAC 480-120-141(3)  
Rules Concerning Operator Service Providers Verbal Disclosure of Rates**

Qwest opposes the alternative rule language proposal for verbal disclosure of operator service provider rates. Qwest offered comment on the earlier version of proposed rule modifications for section (3) of WAC 480-120-141 and continues to advocate the changes addressed in our prior comments. Qwest is aware of the concern expressed by Chairwoman Showalter and Commissioner Hemstad with respect to charges assessed for calls placed through an operator from pay telephones. However, the proposed rule is unlikely to change the rates charged for this service.

The current rules provide the customer with the choice of obtaining rate information prior to placement of their call. If the customer is concerned with the cost of their call they should request a rate quote prior to placing their call. Customers also have the option of directly dialing the call, using a wireless phone or using a calling card. Wireless operator service provider rates will generally not be affected by a Commission rule.

Finally, the proposed rule change will result in customer confusion when sometimes they automatically receive a rate quote and in other cases they must solicit a rate quote. Customers will not understand why sometimes they must ask for a rate quote, while other times it is provided for them.

However, should the Commission decide to proceed with this version of their proposed rule, Qwest agrees with the Sprint proposal that the benchmark should be based on the average operator service provider rates of AT&T, Sprint and Worldcom, plus 25%, and that the benchmark should be adjusted annually. These three large carriers should be representative of the industry and limiting the sample to three carriers will ease the administrative burden on the Commission.

**Definitions for Chapter 480-120 WAC**

Qwest does not believe definitions are required for the following terms and does not agree with many of the definitions proposed for these terms:

- Access code
- Alternate operator services company
- Business

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- Business office
- Business service
- Centrex
- Commission (agency)
- Company
- Competitive local exchange company
- Customer premises equipment (CPE)
- Customer proprietary network information (CPNI)
- Disconnect; disconnection; disconnected
- Facility or facilities
- Force Majeure
- Incumbent Local Exchange Company (ILEC)
- Information service
- Interexchange
- Interexchange company
- Local access and transport area (LATA)
- Local exchange telecommunications service
- Premises
- Private rights-of-way
- Provider of operator services
- Radio Communications Service Company
- Recharge
- Residential
- Reseller
- Results of Operation
- Reverse ALI search capability
- Service interruption
- Telephone exchange service
- Traffic
- Trouble report
- Trunk

Following are Qwest's modifications to the proposed definitions issued on May 15, 2001:

**“Access charge”** means a charge imposed by applicable access tariffs or price lists ~~that compensates the LEC~~ for the provision of connections between end users and an interexchange carrier or other access customers ~~through LEC provided facilities.~~ (Bellcore) (-X11, -X18)

**“Access line”** means a circuit utilized to provide basic local exchange service, and is typically located between a customer’s point of demarcation and a ~~servicing switching~~

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~~center carrier's central office switch.~~ (-031, -033, -051, -056, -081, -138, -141, -510, -525, -535, -X02, -X21)

**“Automatic location identification/data management system (ALI/DMS)”** ~~means a feature-system~~ that forwards to the public safety answering point (PSAP) a caller’s telephone number, the name and service address associated with the telephone number, and supplementary information as defined in the DMS for automatic display at the PSAP. The DMS is a combination of manual procedures and computer programs used to create, store, manipulate, and update data required to provide selective routing, ALI, emergency service numbers, and other information associated with the calling party’s telephone number. (-350)

**“Central office switch”** means a switching unit in a telephone company facility ~~that houses the switching and trunking equipment~~ serving telephones in a defined area. (WAC 118-65-030) (-042, -051, -126, -515, -525, -530, -535)

**“Drop wire”** means company-supplied wire and pedestals placed between a premise and the company distribution plant at the applicant's property line. ~~For drop wire installed after the effective date of this section, a drop wire must be sufficient in capacity to allow the provisioning of three individual basic exchange voice grade access lines.~~ (-X05, -X20)

**“Held orders”** means orders for exchange access lines where the company is temporarily unable to provide service due to lack of facilities ~~or for any other reason.~~ (-535)

**“InterLATA Service”** means a term used to describe services, ~~revenues, functions, etc.,~~ that relate to telecommunications originating in one LATA and terminating in another LATA or outside of the originating LATA. (Bellcore) (-041, -106)

**“IntraLATA Service”** means a term used to describe services, ~~revenues, functions, etc.,~~ that relate to telecommunications that originate and terminate within the same single LATA. (Bellcore) (-041, -106, -X11)

**“Major outages”** means ~~one thousand customer hours lost a service failure lasting for thirty or more minutes, which causes the disruption of local exchange or toll services to more than one thousand subscribers or which causes the~~ total loss of service to a governmental emergency response agency; ~~intercompany trunks or toll trunks not meeting service requirements for four hours or more; or an intermodal link blockage (no dial tone) in excess of ten per cent for more than one hour in any switch or remote switch.~~ (-520, -525, -530)

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**“Person”** unless the context indicates otherwise, means an individual, or an entity such as a ~~firm,~~ partnership, corporation, municipal corporation, agency, or association. (-042, -052, -138, -152, -510, -515, -525, -X04, -X19, -X21)

**“Private line”** means a dedicated, nonswitched telecommunications channel provided between two or more points, ~~and includes the nonswitched portions of a line that has been split.~~ (-515)

**“Standard network interface (SNI)”** is the ~~protector that generally marks the~~ point of interconnection between telecommunications company communications facilities and terminal equipment, protective apparatus, or wiring at a subscriber's premises. The network interface or demarcation point is located on the subscriber's side of the telecommunications company's protector, or the equivalent thereof in cases where a protector is not employed. (-X05)

**“Support structure”** For purposes of this ~~section~~ WAC, “support structure” means the trench, pole, or conduit used to provide a path for placement of drop facilities. (*From -X20*) (-X05, -X20)