

December 22, 2006

**VIA E-MAIL AND FIRST CLASS MAIL**

Carole Washburn  
Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Pk. Dr. S.W.  
PO Box 47250  
Olympia, WA 98504-7250

Re: *Petition for exemption from WAC 480-120-255(3), Information Delivery Services  
Docket No. UT-061465*

Dear Ms. Washburn:

Public Counsel submits these comments in advance of the Commission's December 27, 2006 Open Meeting. Public Counsel opposes the company's proposed notice in its current form and respectfully requests that the Commission take no action to allow for additional time for Qwest, Commission Staff and Public Counsel to try to address our concerns and reach consensus.

**Qwest's Proposed Notice Unnecessarily Dilutes Important Customer Information**

According to WAC 480-120-255(3), an annual notice is exclusively devoted to the topic of Information Service Blocking. While the Commission previously deemed this information important enough to warrant its own bill insert, in Qwest's proposed combined notice, it would share space with three other required notices. Additionally, not only is the Information Service Blocking notice diluted among other topics, but as proposed, the combined notice relegates this topic to the back page of a four page pamphlet. Furthermore, the Customer Service Guarantee Program notice, which was previously required to be sent twice a year—a change that occurred in a Commission decision as a part of a related request—will now only appear in customer bills once a year, and will share the same limited notice space.

**Qwest Overstates the Usefulness of its Website**

In its request, Qwest notes that its website offers customers access to consumer information all year long. Qwest contends that its website is accessible by "most" of its customers, but fails to offer any solid numbers about how many customers have access to the internet. Furthermore, Qwest's website, at best, is difficult to navigate, even for consumers familiar with the internet.

Additionally, the consumer information related to each of the individual topics in the combined notice is not prominently featured on the website. While there is a link to the combined notice, it is one of the last of over sixty separate links on this specific page, and is poorly labeled as solely the “Customer Service Guarantee Program.” Only information related to a service freeze is included among these numerous links under the “Customer Service” portion of Qwest’s website. And although there are forty-six different topics identified as “Frequently Asked Questions” regarding local telephone service—including answers to the questions, “Where can I recycle my old phone books?” and “What is Line-Backer?”—none specifically address any of the topics that are included in the proposed notice.

### **Conclusion**

The combined notice, in its current form, at a minimum, would benefit from formatting improvements that might highlight the most important aspects and clarify information for consumers, such as an increased number of headings throughout the notice, and a summary or table of contents on the first page informing consumers immediately of the information contained in the notice.

However, Public Counsel is uncertain that it makes sense to combine these notices at all. In comparison to the number of advertisement inserts for the Company’s services and products that are found in a monthly bill, Qwest’s regulatory notice requirements are few. The Company’s claim that providing separate notice to customers on various topics is questionable given the number and quality of advertising inserts. Qwest’s commitment to providing excellent customer service should certainly include adequate and effective customer notice of important customer rights.

Stefanie Johnson of our office plans to attend the Commission’s December 27, 2006 open meeting and will address our concerns and answer any questions you may have.

Sincerely,

Simon ffitch  
Assistant Attorney General  
Public Counsel Section Chief

cc: John Cupp  
Mark Reynolds  
Lisa Anderl