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BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Application of Citizens
Telecommunications Company of Idaho for
Registration as a Telecommunications Company

Docket No. UT-991581

MOTION OF CITIZENS
TELECOMMUNICATIONS COMPANY OF
IDAHO FOR EXEMPTION FROM WAC
480-120-010, AND FOR CONTINUATION OF
COMPETITIVE CLASSIFICATION FOR
CERTAIN PRICE LISTED SERVICES

1. Request for Waiver of WAC 480-120-010

Pursuant to WAC 480-120-015, Citizens Telecommunications Company of Idaho ("CTC-Idaho") hereby requests the Commission to grant an exemption from the requirement of WAC 480-121-010 which requires CTC-Idaho to file a price list and petition for competitive classification with its application for registration.

CTC-Idaho filed only its application for registration as a telecommunications company with attached exhibits on October 18, 1999. Because CTC-Idaho does not seek to be classified as a competitive telecommunications company, it did not file a petition for competitive classification or price list in conjunction with the application for registration, as required by WAC 480-121-010 and WAC 480-121-020 (1)(a). On the same date, CTC-Idaho filed a Motion for Exemption from Competitive Classification Petition requirements, which did not include a request for an exemption from the price list requirement of WAC 480-121-010. The purpose of this motion is to ask for such an exemption.

CTC-Idaho requests this exemption because it does not seek classification as a competitive telecommunications company under WAC 480-121-020 (2) and WAC 480-120-023, which would be

required to submit full price lists for all of its services.

2 2. Request for Continuation of Competitive Classification for Price Listed Services

3 On March 21, 2000, CTC-Idaho filed with this Commission requested draft tariffs and some
4 price lists. CTC-Idaho intends to offer the same services as provisioned by U S WEST
5 Communications, Inc. in the exchange area it is acquiring from U S WEST. This acquisition is also
6 before the commission in this docket for approval. Some of these services have received competitive
7 classification, which is why CTC-Idaho's submission of March 21, 2000 included some price lists.
8 CTC-Idaho requests continuation of the competitive service classification for these price listed services
9 as identified in the March 21, 2000 price lists. These services have been, and continue to be, subject to
10 effective competition which the Commission found when these services were originally classified as
11 competitive for U S WEST. Therefore, there is no need to repeat the competitive classification process.
12 It would be in the public interest to allow these services to retain their competitive service classification.
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20 3. Summary

21 Under the circumstances, CTC-Idaho's failure to file a full price list has prejudiced no interested
22 person and would have been inappropriate with its initial filing which sought only registration as a
23 telecommunications company. Therefore, CTC-Idaho requests this Commission to enter an order
24 granting an exemption from WAC 480-121-010. In addition, no reason exists to change the competitive
25 classification of the services which have been price listed just because the provider will change from U S
WEST to CTC-Idaho. Granting the relief requested by this motion will allow CTC-Idaho's application
for registration as a telecommunications company to be deemed complete and CTC-Idaho may receive
registration from this Commission. To do so would be consistent with the public interest, pursuant to
WAC 480-121-015 (1).

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RESPECTFULLY SUBMITTED this _____ day of June, 2000.

WILLIAMS, KASTNER & GIBBS PLLC

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