

**BEFORE THE WASHINGTON UTILITIES  
AND TRANSPORTATION COMMISSION**

**UT-990261**

Carrier-to-Carrier Service ) SUPPLEMENTAL COMMENTS  
Quality Rulemaking ) OF SPRINT CORPORATION  
) ON BEHALF OF UNITED TELEPHONE  
) COMPANY OF THE NORTHWEST AND  
) SPRINT COMMUNICATION COMPANY, L.P.

Pursuant to the August 9, 1999 Notice of Opportunity to File Supplemental Comments (Notice) on in the above-captioned docket, Sprint Corporation ("Sprint"), on behalf of United Telephone Company of the Northwest d.b.a. Sprint and Sprint Communications Company, L.P., respectfully submits the following comments.

Sprint commends the Commission staff for their proactive efforts in this docket and would like the staff to consider several further issues before they draft proposed rules.

Staff has proposed rules modeled on the New York Public Service Commission Order Establishing Permanent Rule on service quality standards (entered June, 30, 1999). Before doing so, Sprint urges that the Commission convene a technical conference to allow all the parties to 1) understand more clearly what the New York standards entail and 2) present more detailed arguments in favor of alternative standards. This process was extremely valuable in Nevada and California (see below), where all parties came to a stipulated agreement on what constitutes a suitable set of

measurements.

Sprint has long participated in and supported the Local Competition Users Group (LCUG), which has developed Service Quality Measurements (SQMs). We believe the LCUG SQMs would provide state commissions with sufficient information to determine if a dominant LEC is providing access, as required by the Act, on a nondiscriminatory basis. Sprint proposes and supports a set of performance measurements that are consistent with the LCUG Service Quality Measurements Version 7.0.

Recently the California and Nevada state commissions adopted stipulated decisions that generally meet the business requirements of LCUG 7.0. In these states all parties, including GTE, AT&T, MCI WorldCom, Nevada Bell, NextLINK and Sprint, agreed to the provisions of the stipulation. That was not the case in the New York docket. In the New York docket, the parties were unable to reach consensus on any of the issues, and the final order was an arbitrated decision. In addition, the standards established by arbitration in New York continue to be revised and for that reason alone cannot be relied upon as an adequate model for Washington.

On the other hand, most parties stated at the recent WUTC workshop that they would support the stipulated agreements in California or Nevada as a starting point for Washington. Sprint believes it would be far better to move forward with proposed standards to which most of the parties have already agreed rather than standards to which very few if any have agreed.

Developing and maintaining performance measurement systems is an expensive process. GTE and Sprint are already developing systems to implement the LCUG-based measurements agreed upon in Nevada and California. Therefore, at least two of the

largest ILECs in Washington could implement a measurement plan consistent with those standards in a timely manner with little incremental expense. The cost of developing additional systems to implement the New York standards is unknown but likely to be substantial.

In conclusion, Sprint believes it would be in the interest of all parties to proceed with a technical workshop before proposing any rules on this subject. There has not been a sufficient airing of the implications of selecting the New York plan as a model for Washington rules. If or when Commission staff does draft proposed rules, Sprint urges that those rules be based on the stipulated decisions reached in California or Nevada instead of the arbitrated decision in New York.

Respectfully submitted this 24<sup>th</sup> day of September, 1999, by

SPRINT CORPORATION on behalf of  
UNITED TELEPHONE COMPANY OF THE  
NORTHWEST AND SPRINT COMMUNICATIONS  
COMPANY, L.P.

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