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Seattle, Washington 98191

Theresa Jensen
Director- Washington Regulatory Affairs
Policy and Law

May 9, 2002

Ms. Carole Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
P. O. Box 47250
Olympia, Washington 98504-7250

Re: UT-991301 - New Price List Rules

Attn: Glenn Blackmon

Dear Ms. Washburn:

I am writing in reference to the notice recently distributed by the Commission to all telecommunications companies concerning the revised Chapter 480-80 WAC rules. The notice highlighted the new requirements at WAC 480-80-206 concerning price list availability to customers. Specifically, WAC 480-80-206 (3) requires the following:

Each telecommunications company offering service under a price list must include in each customer bill or notice:

- (a) The Internet address (uniform resource locator) of the website containing its price list; and
- (b) The toll-free telephone number to use in requesting price list copies and a statement that there is no charge for the price list copy.

Qwest currently provides its internet address and toll-free telephone number on each customer bill. The toll-free telephone number is also on each customer notice. Qwest does not currently include a statement on each bill or notice that there is no charge for a copy of the price list. Qwest apologizes that it did not raise this issue in earlier comments filed concerning draft rule proposals. Qwest missed the proposed requirement of the specific statement on each bill or notice.

Qwest understands that the CR-102 may have not yet been filed and respectfully requests the Commission revise proposed WAC 480-80-206(3) as follows:

Each telecommunications company offering service under a price list must include in each customer bill:

- (a) The Internet address (uniform resource locator) of the website containing its price list; and
- (b) The toll-free telephone number to use in requesting price list copies.

Qwest also requests the Commission modify proposed WAC 480-120-193(1)(d) to exclude the requirement to include the internet address on each customer notice. Qwest respectfully requests the Commission revise proposed WAC 480-120-193(1)(d) as follows:

- (d) Include on each customer bill and notice the address of the tariff website and toll-free telephone number.

The request to modify proposed WAC 480-80-206(3) above would make the price list rules more consistent with comparable tariff rules. The requirement to include a statement on each bill or notice that there is no charge for a copy of the price list is unnecessary and requires a modification to the current bill not readily available. Customers generally do not know what services are offered via a price list or a tariff, nor do they necessarily understand the significance or difference. Therefore the proposed statement may not be very meaningful. In addition, most customers never request a copy of a section of a tariff or price list or the entire document. In addition, Qwest bills on behalf of other carriers that are also required to include this statement on their bill page or section of the Qwest bill. These carriers have contacted Qwest to arrange for this additional language to include with their portion of the Qwest bill. Thus a customer may see this statement several times on the same bill.

Currently Qwest customers call the toll-free number on the bill to request copies of tariffs or price lists. This existing arrangement is satisfactory. Qwest also recently modified its internet home page to include a direct link to Qwest tariffs. The link actually includes both tariffs and price lists. Therefore a customer can readily access Qwest tariffs and price lists once they access Qwest.com. In addition, the Commission's own consumer web site is linked to the Qwest tariff and price list data base. Qwest respectfully requests the Commission refrain from requiring an unnecessary statement on the bill.

Qwest also cannot comply with the obligation to include the internet address on each customer notice. This is not an issue for bill inserts or direct letters that may be sent in the future but it does require modification of standardized notices such as late payment notices, disconnect notices, etc. As previously stated the toll free number is include with each notice and has proven to be sufficient. Should the Commission retain the obligation to include the internet address on each customer notice, Qwest respectfully requests the Commission allow all telecommunications providers an interval of

approximately two to three months to implement this change on standardized notices and or customer bills.

If you have any questions concerning these comments, please call me at 206-345-4726.

Very truly yours,

cc: Chairwoman Marilyn Showalter
Commissioner Richard Hemstad
Commissioner Patrick Oshie

