

July 3, 2001

Ms. Carole Washburn  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive  
Olympia, WA 98504-7250

Re: Docket #UT-990146  
Chapter 480-120-141 Operator Service Providers

Dear Ms. Washburn:

WorldCom, Inc, on behalf of its regulated subsidiaries, and AT&T Communications of the Pacific Northwest, Inc. ("Commentors") submit the following comments in response to the Supplemental Notice of Opportunity to File Written Comments and to Proposed Alternative Rule Language on Draft Rules Concerning Operator Service Providers issued on May 15, 2001.

### **Discussion Draft WAC 480-120-141(3)**

#### Verbal Disclosure of Rates

Commentors believe the current rules are sufficient to protect the consumer from being surprised by an operator service charge on their bill. Commentors further believe that the new proposed verbal disclosure requirements would be detrimental to consumer interests. First, customers without the need, desire or patience to listen to a rate quote will be unnecessarily burdened by the current proposed rule. Under current practices, consumers who are unaware of the cost of a particular call and who wish to receive a rate quote can obtain one prior to placing the call. Most customers, however, would prefer a minimum amount of automated messaging so that their calls can be connected as soon as possible. Any required increase in automated messaging time would likely cause great frustration on the part of the majority of operator service users. Second, any requirement to add the proposed verbal disclosures would require significant development and engender other costs. Unnecessarily raising the costs of operator assisted calls would be detrimental to consumers and is contrary to the Commission's goals in this proceeding. Therefore, Commentors strongly believe that there is no need to change the current rule and opposes the proposed rule.

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Establishment of Benchmark

A benchmark is not needed for a competitive service, and OSP rates are no exception. However, in the alternative, Commentors support Sprint's proposal; that the benchmark be based on the average OSP rate of WorldCom, AT&T, and Sprint, plus 25%, and be adjusted annually by the WUTC. Similar rules are in place in other states, such as Montana, and serve to provide the protections Commentors believe the WUTC is seeking. Specifically, this would ensure that rates are within a zone that is consistent with the competitive market and thus prevent individual companies from surprising consumers by charging rates that are well above market levels.

Submitted this 3<sup>rd</sup> day of July, 2001.

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