



April 14, 2004

**VIA ELECTRONIC MAIL AND FEDEX**

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

Re: WA UT 040015  
MCI's Comments on Possible Telecom-related Rule Changes

Dear Ms. Washburn:

WorldCom, Inc., on behalf of its regulated subsidiaries in Washington (n/k/a/ MCI), hereby provides the following additional comments regarding the proposed rule changes in this docket. These comments supplement those filed by MCI on February 20, 2004.

**WAC 480-120-021 (Definitions - discontinuation).** Instead of amending the definition of "discontinuation," MCI supports the addition of the term "suspension" to the list of definitions. MCI is concerned that suspension (also referred to as "soft disconnection" or "temporary discontinuation") of a local customer for financial reasons, prior to full disconnection (which currently fits into the Commission's definition of discontinuation) should not be regarded as a violation of the quoted timeframes for disconnection, which are contained in customer notices. When local service is suspended, customers are still able to place Emergency 911 calls from their telephone number. This is not the case when service is fully disconnected.

Only after full disconnection of local service would a customer be required to apply for local service after payment of the balance due, and be responsible for additional charges, such as reconnection fees. Suspended service may be restored without having to re-apply for local service and would require payment of a local service restoration fee and not other reconnection charges. This distinction should be recognized in the definitions.

The use of service suspension, prior to full disconnection is actually a more customer-friendly approach to the process of restricting service for financial reasons. If the

distinction between suspension and disconnection of service is not recognized, companies would have to bring an account straight to a full "disconnect" status at the time that a past-due amount would otherwise have first been suspended. Such a change would provide no benefits to customers and would only inhibit a company's ability effectively to attempt to collect past-due balances.

**WAC 480-120-173, 480-120-122 (Cross References to "deceptive practices").** MCI concurs with the point raised at the March 11, 2004 workshop that the term "restoring" service, as used in WAC 480-120-173, should be replaced by a different term. "Restoral" of service indicates that service had been "suspended" or placed under a "soft disconnect" or "temporary disconnect," rather than a full disconnection of service. From MCI's perspective, use of the term "reactivating" service would be more accurate for describing situations when service had been fully disconnected.

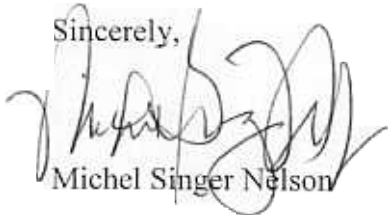
**WAC 480-120-147 (Changes in local exchange and intrastate toll services).** MCI agrees with Verizon's comments on this proposed rule change that any dating requirement that the Commission might adopt should permit techniques that the companies currently use. MCI supports adding language which states, "The date of the authorization shall be included with the documentation."

**WAC 480-120-164 (Pro-rata credits).** MCI proposes that the following language be added to the end of the current proposal, "Such credits shall be required when the company is made aware of the unavailability of the service during the normal course of servicing or reviewing the impacted customer's account."

**WAC 480-120-173 (Restorals).** The point was raised during the March 11, 2004 workshop (regarding page 24 of the Staff's Summary of Comments) that restoring (reactivation) of service after disconnection does not necessarily require that the customer be provided with the same telephone number that had been disconnected. Prior to that clarification, it could have been argued that this rule would require reactivation of the same telephone number, which would not be feasible after a certain length of time.

MCI appreciates the opportunity to submit comments to the Commission concerning proposed rule changes. Contact me if you have questions or concerns about these or any other comments submitted by MCI in this proceeding.

Sincerely,



Michel Singer Nelson



I hereby certify that I served a true and correct copy of the foregoing on the following:

*Please see attached Service List*

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- By **faxing** full, true, and correct copies thereof to the attorneys at the fax numbers shown above, which are the last known fax numbers for the attorneys' offices, on the date set forth below. The receiving fax machines were operating at the time of service and the transmissions were properly completed, according to the attached confirmation reports.
- By **mailing** full, true, and correct copies thereof in sealed, first-class postage-prepaid envelopes, addressed to the attorneys as shown above, the last-known office addresses of the attorneys, and deposited with the United States Postal Service at Seattle, Washington, on the date set forth below.
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DATED 14th of April, 2004

  
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Ragnhild Kinoshita

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Name: Telecommunications General  
Comments:  
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