

SUMMARY

Sprint's Comments On Cost Allocation for the Consumer Education Plan for 564 Area Code

Sprint supports the need for a public education plan to ensure consumers are aware of the new dialing pattern required once the 564 overlay is implemented. Basing the cost to each company on the number of telephone number prefixes (NXXs) held would result in an inequitable allocation of plan expenses. Additionally, it would result in an imprudent expenditure for Sprint compared to the cost Sprint would incur to put together its own communication plan in keeping with the goals approved by the Commission. The commission should give companies the opportunity to opt out of the industry plan and implement their own plan. If the Commission is unwilling to consider this alternative, then the Commission should not order an allocation of costs that would exceed what the company would expect to expend to implement its own education campaign.

Sprint asserts that companies should not be expected to expend advertising costs for education efforts on ten-digit dialing in eastern Washington, nor should such costs be allocated across the industry. Such efforts will only lead to customer confusion. Finally, Sprint supports the utilization of the Washington Independent Telephone Association (WITA) to collect and distribute the assessments ordered by the Commission for any industry effort that is undertaken, provided that WITA should not be held responsible for any amounts it is unable to collect.