

February 16, 2001

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

Dear Ms. Washburn:

Subject: **VERIZON NORTHWEST COMMENTS - UT-991535**

These are Verizon Northwest Inc. comments in the above-referenced docket filed in response to the Commission's February 1, 2001, Notice of Opportunity to File Comments. Verizon Northwest supports the Commission Staff's recommendation of allocating the consumer education plan costs for the 564 area code overlay based on telephone number prefixes (NXX's) assigned to each service provider. This approach is both fair and impartial.

Verizon Northwest does not object to the Washington Independent Telephone Association (WITA) acting as the collection and dispersal agent subject to a review of any legal limitations and if WITA receives recovery of its administrative expenses for this role. However, in the event that a company fails to contribute its portion, the Commission should provide the necessary enforcement because WITA can not fulfill the role of a collection agency.

Verizon appreciates the opportunity to comment on these rules.

Please direct any questions to Joan Gage at 425-261-5238.

Very truly yours,

Lida C. Tong
Director – Regulatory & Governmental Affairs

j:eagroup\joan\jg201.doc