

Qwest

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Via E-Mail and U.S. Mail

July 25, 2001

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

RE: Docket No. A-010648
Rulemaking: Chapter 480-09 WAC – Procedure
ATTN: Judge Dennis Moss

Qwest Corporation (“Qwest”) hereby submits its written comments pursuant to the Commission’s June 1, 2001 Notice of Opportunity to File Written Comments in the above-referenced rulemaking docket.

Qwest submits its comments in the form of a proposed, wholly-reorganized WAC chapter (entitled “WAC 480-10” to avoid confusion). The draft chapter is provided in legislative format, with the strikeouts and underlines reflecting changes to existing language in Chapter 480-09. The proposed chapter is footnoted to map the origin (in the existing procedural rules) of each section and subsection.

In summary, Qwest’s proposed Chapter 480-10 seeks to accomplish the following:

- Adoption of uniform formatting for sections, subsections and headings.
- Reorganization of the procedural rules to more logically and chronologically conform to the Administrative Procedure Act and the course of Commission proceedings.
- Modification and clarification of headings to allow the public and parties to more readily access and utilize the procedural rules.
- Elimination of duplicative and/or inconsistent procedural requirements.

- Incorporation, where appropriate, of concepts and language from the Superior Court Civil Rules.
- Harmonization between the written rules and actual practice before the Commission.

At this early stage, Qwest has not had a full opportunity to reflect upon and suggest all substantive and organizational changes to the procedural rules which may be appropriate. Qwest reserves the right to supplement and revise its comments. Qwest also suggests that the Commission request interested persons to submit a list of additional substantive changes to be considered at the next workshop. Initially, Qwest would suggest that this list include a discussion of whether and to what extent the existing discovery rules should be expanded or reformed.

Qwest appreciates the opportunity to submit its written comments and looks forward to continued participation in this rulemaking proceeding.

Sincerely,

Adam L. Sherr

ALS/llw

Enclosures (hard copy and disk - MS Word 97 format)