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Public Policy

May 12, 2000

Carole J. Washburn
Executive Secretary
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive S. W.
Olympia, Washington 98504-7250

Re: Docket Nos. UT-991922, UT-991301 and UT-990146
Attention: Sondra Walsh and Mary Taylor

Dear Ms. Washburn:

Enclosed are an original and ten copies of U S WEST's comments in the above referenced dockets. A 3.5 diskette is enclosed and these comments were also filed electronically.

INTRODUCTION

U S WEST appreciates the opportunity to provide additional comment on the consumer rules discussed at the April 11, 2000 workshop. The attached comments address the questions raised at the workshop and also reflect additional U S WEST concerns with the proposed rules. U S WEST will continue to submit comments as the need arises and is available to respond to any question that may arise as a result of the following comments.

U S WEST respectfully requests the Commission clearly identify up front that these rules apply to all telecommunications providers and that they are applicable to residential customers only, unless otherwise noted. The majority of business customers have multiple providers from which to select service and commission requirements for business conduct is no longer necessary. The Commission should allow telecommunications carriers to conduct business with business customers as most business to business relationships are managed.

U S WEST does propose that new rules be developed to address those situations where telecommunications carriers, including resellers, choose to exit Washington and no longer offer service. U S WEST has had to help customers in the past, when their local service

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provider has exited the market - without providing customers sufficient notice, find a new service provider. Also these customers have had to bear the expense of reestablishing service with a new provider. These are examples of the types of concerns that such a new rule might address.

If you have questions regarding these comments, please contact me or Theresa Jensen on (206) 345-4726.

Sincerely,

Holly Dean

Attachments (4)

Re: Docket Nos. UT-991922, UT-991301 and UT-990146

The following are U S WEST's additional comments on the consumer rules discussed at the April 11, 2000 workshop.

480-120-041 Availability of Information

480-120-041 (1): The April 11, 2000 minutes request comments on issuing a confirming service notice and how that might be accomplished, explanation of the services ordered, rates, hours, problems anticipated, etc.

U S WEST currently provides new customers with a "welcome" letter after they have placed their order for new service. This letter includes the following information: the customer's assigned telephone number, a list of optional services ordered by the customer, a brochure explaining the service(s), how they can reach us if they have questions concerning their new service, and our refund policy if the customer is not satisfied within the first 60 days. (Attachments 1 and 2) As you can see, the letter does not provide the detail proposed by the Commission staff.

U S WEST believes the best approach to this Commission staff objective would be a requirement that each company file within its tariff a "Consumer Bill Of Rights" section that would address each of the items proposed in 480-120-041 (1). The rule should allow companies to determine how to best to provide this information and what information should be provided to customers.

To address the Commission's concern that customers be advised that such information is available, the rule could require that companies advise their customers of such information once a year in a very general manner. For example, a message line on the bill advising the customer that information is available and includes instructions as to how to obtain such information.

Another option for consideration would be to include such information as part of a notice to collect delinquent funds since the scope of the existing rule tends to be oriented to this type of activity. It could be included as part of the notice. (Attachment 3) Most customers never require information of the nature proposed by this rule. To require an education program for all customers beyond that required in the current rule is an unnecessary cost and not an efficient use of ratepayer contributions.

If the Commission staff believes that the availability of this information to consumers should be required of all telecommunications companies, U S WEST proposes that the existing rule be retained. The current rule requires companies to make such information available to the public upon request and as part of the telephone directory. If the Commission is concerned that consumers are not aware of the availability of such information, then an added provision that requires a general annual notice would suffice. However, each company should be allowed to determine the best manner in which to comply with this requirement.

In addition, comments were requested concerning provision of information electronically to customers. Currently, U S WEST has a web site where customers can establish a secure ID and access their bills. Later this year, there will be an option allowing customers to choose electronic bills over paper, along with electronic funds transfer. With this option, an e-mail will be sent to customers advising them when their bill is ready for viewing. The U S WEST web site also provides information on services, how to reach the business office by phone or e-mail, and allows a customer to place an order for service. Many telephone directory providers now have web sites providing business and residential listings. WUTC administrative rules are available on the web, as well as U S WEST's tariffs. Customers without a personal internet connection

can obtain this information, free of charge, by visiting their local library or many of their local schools.

U S WEST suggests the following additional changes to WAC 480-120-041.

480-120-041 (3) (c) needs to be corrected to refer to section 1 not section 3, should staff continue to retain the proposed rule language.

480-120-041 (4) should be amended to require the customer's service provider to provide a customer a detailed accounting for the calls for which the customers has been billed. The proposed rule could be interpreted to suggest the party that bills the customer has this obligation. The billing entity may not be able to provide the additional detail required by the proposed rule. The customer's provider of the "billed service" should be the responsible party.

480-120-041 (5) should be clarified to specify which brochures, etc. specific to 480-120-041 as opposed to any and all brochures sent to customers, etc.

480-120-041 (7) should be eliminated. U S WEST is concerned that this requirement could be construed by the interexchange carrier as anti-competitive. However, should the Commission staff proceed with such a requirement, at a minimum the rule should be modified to eliminate the requirement for the local exchange company to advise the customer that they should ensure they receive their chosen rate plan. It is highly probable that this requirement would open a discussion about the "chosen rate plan" which the local exchange company representative couldn't discuss and should not discuss for fear of anti-competitive behavior allegations.

480-120-042, Directory Service

480-120-042 (3): The April 11, 2000 minutes request clarifying information concerning what is included in "handling charges" for additional directories.

U S WEST DEX provides additional directories on a region-wide basis and charges a market based price for each of directory based on the cost to produce the directory, an approximate 7% shipping and handling fee and a reasonable profit.

480-120-042 (3) should be amended to allow a company to recover its total actual cost for providing and delivering the additional directory, as specified by the rule, which should include the recovery of the costs incurred associated with the processing of the request itself. \$0.50 would not recover this cost.

480-120-056, Establishment of Credit

U S WEST applauds the Commission staff's recognition of the distinctions between residential and business subscribers. However, U S WEST is most concerned about some of the significant changes proposed in WAC 480-120-056. These changes will have a direct bearing on the amount of non-collectible expense incurred by local exchange companies. These changes further restrict a company's ability to protect itself against bad debt. It is unclear why such changes are proposed. This is clearly an area where an SBEIS must be gathered. Following are those areas where U S WEST believes significant change is proposed:

WAC 480-120-056 (1) currently requires the customer to have service within the prior twelve months for at least six consecutive months. Under the Commission staff's proposed rule the six consecutive month requirement is eliminated. Proposed WAC 480-120-056 (1) should be modified to include the six consecutive month language contained in the current rule.

The proposed rule, as written, would enable a customer to obtain service without a deposit if they had service for less than one month within the prior twelve months, as long as they met the

WAC 480-120-056 (1) (a) or (b) criteria. This is a significant change that will require SBEIS quantification.

Retention of the six-month criteria does not change the criteria the companies must satisfy prior to requesting a deposit. However, in most cases, it does represent a sufficient period of time over which a customer's payment behavior is indicative of how they will make payments to their new provider. The proposed 480-120-056 (1) (a) or (b) criteria is meaningless if the customer only had their service for one or two months since most companies do not begin collection activity until at least two or more months of service has been furnished. U S WEST respectfully requests that the Commission retain the six-month criteria.

480-120-056 (1) (a): 480-120-056 currently enables a local exchange carrier to request a deposit if the customer received more than one delinquency notice during the six consecutive month period discussed above. The proposed rule modifies this criteria to now require more than three notices as opposed to more than a single notice. This is a significant change that will require SBEIS quantification. For a customer to receive at least three notices, they have typically not paid a bill for close to ninety days each time a notice is triggered. This proposed change would most likely put more customers at risk for non-payment and increase local exchange company un-collectible expense. U S WEST respectfully requests the one delinquency notice criteria be retained.

480-120-056 (2) (b): The April 11, 2000 minutes suggest staff plans to change "full-time employment" to some other language to reflect current employment patterns. However, no further detail is provided. U S WEST does not believe it is necessary to modify this language. While the language is permissive, it does not require the local exchange company to absolutely collect a deposit. Different employment patterns may be viewed by the company as sufficient in meeting this criteria as long as they represent stable monthly income.

If the Commission staff decides to proceed with modified language for this section, perhaps a modification as follows would be appropriate: "full time employment or the equivalent of such".

480-120-056 (3): The April 11, 2000 minutes suggest staff plans to change (3) (a) in its entirety. However, it is unclear what changes will occur. U S WEST encourages staff to retain the existing criteria in WAC 480-120-056 (4). The proposed language does not reflect the criteria in section (1); the current rule language does recognize this criteria. Existing rule language (4) (b) must also be retained as it attempts to address the issue of consumer fraud, which continues to be a problem.

480-120-056 (4): The April 11, 2000 minutes request additional comments on whether there are alternative ways to accomplish the staff's goal to ensure that local exchange companies are only collecting deposits for IXC's that have authority to collect deposits. A requirement of this nature would create an additional expense that does not exist at this time.

U S WEST finds the current proposed language reasonable in that it places the responsibility on the interexchange carrier which it where it belongs. The interexchange carrier negotiates the terms of the billing and collection arrangement with their billing provider. It is within these agreements that the provision concerning the collection of deposits is addressed. As long as the Commission's rules require the carrier to have authorization by price list, the interexchange carrier responsibility is addressed. Under the proposed rule language, if the carrier does not have this authorization then they are legally precluded from asking their billing agent to collect deposits on their behalf. If a local exchange company requests a deposit on behalf of an interexchange carrier, it is because the carrier has negotiated such as part of their billing/collection contract.

480-120-056 (6): The April 11, 2000 minutes request suggestions on a way to break the

proposed criteria apart so that the criteria is clear and more easily understood. U S WEST suggests the criteria for nonresidential be eliminated for consistency with section (5). Elimination of nonresidential criteria would enable the following simplistic approach:

- (6) Required deposit amounts for a residential applicant/customer for service may not exceed:
- two months customary usage based on previous verifiable service
 - two months estimated usage if no prior verifiable service or,
 - a simplified deposit calculation allowing the use of a state average figure based on average residential and business numbers.

This method of determining deposit amounts is preferred for customers who do not have previous verifiable records upon which to base a deposit. A state average deposit would simplify and reduce contact length, and avoid last minute calculations of deposit amounts to be quoted to customers.

When usage charges exceed thirty dollars or twenty percent of (a) or (b) above, a payment of such usage charges or an additional deposit must be made before close of the next business day. If the customer chooses to pay an additional deposit, the deposit amount shall be based on actual usage billed for a two-month period. Prior to disconnection of service the customer must receive written or verbal notice.

Another option would be to allow the local exchange company to restrict toll usage until the situation has been satisfactorily resolved. The proposed rule could be modified as follows to include such a provision:

When usage charges exceed thirty dollars or twenty percent of (a) or (b) above, the following options may be required by a local exchange company before close of the next business day:

payment of such usage charges

payment of an additional deposit based on two months actual usage.

Prior to disconnection of service the customer must receive written or verbal notice. The company may toll restrict the customers service in lieu of disconnection of service.

480-120-056 (6) (i): This rule seems to address unbilled toll treatment and would be better put in a section by itself.

480-120-056 (7) (b): It is unclear how (7) (b) relates to section (4). It seems that section (4) suggests that interexchange carriers have complete freedom with respect to whether or not a deposit can be collected. This seems entirely appropriate since interexchange service (toll) is competitively classified. U S WEST suggests elimination of section (7) (b) for all toll providers.

480-120-056 (9): U S WEST requests the Commission staff retains the existing rule language on deposit transfers. The proposed language could be misread to suggest that the companies are obligated to refund deposits if a customer transfers their service, even though the deposit may still be necessary. The current rule language is clearer.

480-120-056 (11): The proposed rule language is new, inconsistent with 480-120-056 (6) and creates a greater risk than that imposed by the current rules. Therefore, this is another area requiring SBEIS quantification. The current rule (section 5 (c)) provides for four business days while the proposed rule provides for six or nine days. U S WEST requests the Commission staff retain the

current rule parameters.

480-120-056 (13): The proposed rule language again significantly modifies the current rule. (a) (i) has been modified from “initiated disconnect proceedings” to “disconnected service”. (a) (ii) has been modified from two to three notices. Therefore, this is another area requiring SBEIS quantification.

U S WEST does not consider the customer to have established satisfactory credit if disconnection proceedings had to be initiated. A requirement to return a deposit to a customer based on the fact that the service was not disconnected even though the customer was treated for delinquent payment on a regular basis creates a greater risk than that experienced by a local exchange company presently. A customer whom U S WEST had to initiate disconnect activity with is most likely a credit risk. Therefore, U S WEST respectfully requests the Commission staff retain the current rule language in (11)(a) (i) and (ii). The same concerns exist in changing the two notice criteria to three notices. These are clearly circumstances where increased bad debt expense will be incurred to a greater extent than that currently experienced because these are customers who have demonstrated they are a “risk” to the local exchange company.

480-120-056 (14): The proposed business office requirement in should be eliminated regardless of whether the intent is a check or cash. U S WEST business offices do not have the ability to render a check.

The current rule should be retained, as it does not require that the deposit be paid in the form of a check unless requested by the customer. Deposits applied or refunded to the customer’s account is the preferred option.

480-120-057, Deposit or Security-Resellers

The April 11, 2000 minutes request comments on whether this rule is necessary and if it is useful. The thought is raised that such a rule might be necessary to ensure companies protect residential customers from covering losses to interexchange carriers and or resellers.

U S WEST does not believe a rule is necessary and that all telecommunications providers should be free to require a deposit of resellers and/or interexchange carriers when circumstances dictate such. This is the best means of protecting the ratepayer interest. Qualifying when a deposit can be requested may increase ratepayer expense if the criteria is not adequate. Carriers should be free to negotiate such arrangements and by doing so will protect the ratepayer. If a carrier objects to such a request, they can bring their complaint before the Commission.

U S WEST continues to support the concept of the application of a deposit rule only to residential customers.

The April 11, 2000 minutes also request comments relating to disconnection of interexchange carriers (also in 480-120-081, Discontinuance of Service). For the reason stated above, U S WEST does not believe that this rule is not necessary. Security, disconnection of service and any other rules pertaining to carriers or resellers are subject to contract terms, reviewed by the Commission. Again, if the Commission staff proposes criteria that delay disconnection of carrier service due to non-payment, the ratepayer will be at risk. The Commission should refrain from interjecting itself in carrier-to-carrier business arrangements other than through current arbitration or complaint processes.

U S WEST does suggest that rules for carriers, including resellers, who choose to exist Washington and no longer offer service should be initiated. U S WEST has had to help customers in the past when their local service provider has exited the market without providing customers

sufficient notice to find a new provider. Also, these customers have had to bear the expense of reestablishing service with a new provider. These are examples of the types of concerns that such a new rule might address.

With respect to the question of application of rules, U S WEST respectfully requests the Commission clearly identify up front that these rules apply to all telecommunications providers and that they are applicable to end users only.

480-120-061, Refusal of Service

480-120-061(4): The April 11, 2000 minutes requested comments on the issue of service suspension versus final bill. U S WEST does not believe 480-120-061 addresses either service suspension or final bill but rather it addresses denial of service. In other words, the delay of service provisioning. If fraudulent behavior occurs once service has already been installed, then the current rule language at WAC 480-120-056 (4) (b) or at 480-120-081 (2) (g) applies. That is why U S WEST urges the Commission staff to retain this language in 480-120-056. 480-120-061 is applicable to applications for service not yet installed.

With respect to the Commission staff's request for comment on service suspension versus final bill, regardless of which rule it is addressed within, U S WEST provides the following perspective. It should be the company's option whether to temporarily suspend a service, based upon risk evaluation and likelihood of collecting the amount due during the suspension period. Suspension, continuous billing and reduced reconnection fees are to the customer's advantage and should be a business decision based on risk assessment, not rule-mandated.

480-120-061 (7): The April 11, 2000 minutes request additional comments concerning how to better address this section of the rule to balance the interests of the company and not inconvenience the customer. U S WEST believes the current rule accomplishes this balance and respectfully requests that the Commission staff retain the current rule language with one exception. The current rule utilizes a broader perspective when it refers to "accurate and verifiable information". The proposed rule is actually narrower in that it requires verifiable identification.

Information and identification are different as defined by the proposed rule language. Through use of the term "information" in the current rule the consumer can produce evidence other than picture identification. This also enables the customer to provide such proof other than by physically presenting such identification. While most customers do produce picture identification, the current rule does enable consumers to offer alternatives which may eliminate the need for a trip to a business office or payment agency.

U S WEST requests that the Commission staff eliminate the current requirement that payment agencies provide this service. U S WEST has found that most payment agencies will not agree to perform this function. Rather than lose such businesses as payment agencies, U S WEST would like to utilize other methods and offer applicants for service alternative approaches.

Generally speaking, only customers involved in or suspected of fraud are asked to prove their identity. When a customer needs to verify their identity, U S WEST requests (2) verifiable pieces of identification. This information can be taken to any U S WEST office or authorized payment agent to be faxed to the Caller Identification Center. The following information is acceptable proof of identification: ID card with picture; social security card; immigration card, birth certificate; college or school identification, company identification, drivers license, federal or state identification, insurance card, military ID card, passport, payroll stub with name and social security

number; phone company letter of credit; social security check stub with name and current address, tribal identification card, vehicle registration; voter registration; utility bill with current and previous address or a copy of a W2. For this reason, the current rule language should be retained but modified to eliminate the payment agency requirement.

480-120-061 (10): Finally, the April 11, 2000 minutes requested comments generally on number portability. Specifically, staff requested comments on whether number portability should be included in this rulemaking or a separate rulemaking. U S WEST proposed deleting this section of the rule in earlier written comments. We continue to believe this issue should be left to the FCC. If staff believes a rule is necessary, U S WEST believes it should be addressed in a separate proceeding.

480-120-081, Discontinuance of Service

480-120-081 (1): The April 11, 2000 minutes request comments on the need for this rule. U S WEST has already provided comment that this rule is not needed. Voluntary disconnection is covered by normal business practices and relationships between customer and company, and need not be subject to rules. Should staff continue with this language, the disconnection date should be to state “one business day”.

480-120-081 (2): The April 11, 2000 minutes also request comments concerning fraud. U S WEST continues to have problems with customer fraud and has methods in place to investigate suspected fraud. In Washington, a BCI (bad customer identification) letter is sent to the customer suspected of fraud. This letter requests additional information and includes a sworn statement before a notary republic. This letter requests a current picture, a copy of current signed lease agreement, a copy of the social security card; landlord or caretaker’s phone number and address and the customer’s work telephone number. The customer has eight business days to return the notarized letter. If the letter has not been returned, on the ninth day we attempt to contact the customer a final time. If we are not able to contact them, service is disconnect (day 10).

U S WEST would suggest a disconnect date after five business days from mailing. Neither second notices nor additional courtesy calls should be required, as this needlessly delays disconnection of unpaid accounts driving up accumulated bad debt. As written, the rule affects every account in the state. It drives up the cost of doing business by increasing bad debt losses.

480-120-081 (7): It appears the proposed rules contain new requirements concerning the disconnect notice and required interval at (7) (a) (i) and (v) and at (7) (c). These new requirements require SBEIS quantification.

The intervals at (7) (a) are inappropriate. There should be no difference in billing and collection procedures based on whether bills or notices are mailed from out-of-state. Mail (including payment processing) travels as quickly from outside the state as within the state. Collection action does not begin until after the due date has been missed by the customer and the bill amount remains treatable based on the amount due and the credit risk involved, at which time a disconnect notice is sent.

U S WEST currently provides for an eight day interval once the notice has been rendered. In other states, five or six days is allowed. It is important to remember when considering the appropriate interval that the customer has already had a number of days to pay their bill since the bill was rendered and since the charges were incurred.

For example, most local exchange carriers bill customers in advance for local service and in arrears for usage based services. By the time the customer receives their bill and pays the bill based

on the noted due date, the advanced billed service have now been utilized. This is particularly true at U S WEST since the bill due dates are 15 days after the mail date of the bill. There is also additional time allowed between the bill “due” date and the date when the business office takes action to further attempt to collect the bill. Otherwise known as a “grace” period to address the situations of payments delayed or mailed a few days later.

In general, suspension or disconnect action is not taken until the next bill is well on its way to the customer and the treatable balance of the old bill is at minimum two calendar weeks past due. In addition, a customer’s basic exchange service is not at jeopardy for non-payment of toll or unregulated services, both of which can be restricted or removed without affecting dial tone.

Therefore, U S WEST respectfully requests the Commission staff refrain from establishing collection intervals and enable the companies to determine the most appropriate intervals based on their own business decisions.

480-120-081 (7) (c) (i) and (ii) requires a second notice not currently required by the existing rules. U S WEST opposes this requirement as it further delays the process which creates additional risk for un-collectible expense. As explained above, the customer should not be allowed to not pay their bill for services rendered within a reasonable interval. To further delay disconnect action by imposing a second notice while retaining the requirements found in the existing rule at (5) (b) is unreasonable. U S WEST respectfully requests this language be stricken in the next proposed draft.

480-120-081 (8): The proposed language concerning discussions with the company’s representatives is too vague. U S WEST respectfully requests that all of proposed section (8) be eliminated because it is often used by customers to buy additional time who never intend to pay the amount past due. Should the Commission staff continue with this proposed language, U S W EST requests the Commission staff continue with the current rule language at (5) (g) or that the following language be eliminated “or while engaged in discussions with the company’s representatives or with the Commission.” Continued use of such language may create unnecessary confusion since it is not clear what is intended. The current language more accurately reflects intent.

480-120-081 other comments: Staff also requested comments on the application of these rules. Clearly these rules should apply to residential customers only. How to collect past due amounts from business and other telecommunications providers (such as interexchange carriers, resellers, internet service providers) should not be mandated by Commission rule.

WAC 480-120-510, Charging for use Payment Agencies

The April 11, 2000 minutes requested comments on payment agencies charging customers to process payments. The majority of customers make their payments by mail, credit card, automatic payment, etc. Payment agents are utilized by a relatively small number of customers. Therefore, it is becoming increasingly difficult to obtain agents in order to maintain or expand the pool of available customer payment locations. U S WEST believes companies should exhaust all possible businesses in an area to establish a payment location without the customer incurring a fee for processing their payment. However, where all viable options have been exhausted for establishing a non-fee agent, U S WEST supports allowing a minimal fee be charged by the payment agency to process payments. Increasing company payment agency expenses will result if fees are eliminated entirely, which will be entirely borne by the ratepayer. It is not fair for the majority of ratepayers to subsidize the few that use agencies.

Shared Tenant Service (STS) Providers

The April 11, 2000 minutes request comment on the need for a rule concerning rates charged by shared tenant service providers. The Commission staff points out that such providers are not regulated and that there are customers that are being served by non-regulated entities. The staff is concerned that these customers are not afforded services, like those offered under the telephone assistance plan (WTAP), because of the way the non-regulated entity applies its practices. The staff recognizes the statute provisions that prohibit regulation of STS providers.

U S WEST believes the only recourse requires a legislative solution. The Commission does not have statutory authority to prohibit STS providers from charging exorbitant rates or from providing service at specified rates. However, it is clear from current STS provider practices that legislative changes should be initiated by the Commission. For example, U S WEST is aware of a current STS provider practice that requires a tenant who chooses an alternative telephone provider to pay extraordinary charges. This provider has a provision that states the following: "...Tenants who choose a telephone service provider other than [Brand X Communications, Inc.], will be charged a one-time cross-connect fee of \$120.00, in addition to any hook up fees charged by the alternate service provider."

WAC 480-120-101, Complaints and Disputes

WAC 480-120-101 (2) (b) should be eliminated since it is already required of the appropriate company at (1) (f). The billing agent should not also have this requirement as it creates an additional expense and requires valuable time that may delay other customers, who are holding and waiting for an available representative to complete their calls.

WAC 480-120-101 (5) has been modified to require record retention for three years where the current rule requires retention for one year. The current rule language should be retained.

The April 11, 2000 minutes also request comment on the two working day interval. The proposed rule language at (4) (b) appears to be new and may help address the concern raised at the previous workshop. The concern with the two-day interval appears to exist in two areas.

First, the amount of detail requested by the Commission staff. There have been instances where the company has been asked to produce dates for several months or in some cases, more than one year. It is in these circumstances that a two-day interval cannot be met. The concern is that the company not be recorded as violating this rule when it is asked to produce background information that cannot be reasonably produced within two working days. This is actually more of a procedural question than a rule language issue and is best resolved outside of this process.

Second, the concern has been more related to a difference in opinion as to whether the company has met its burden and the complaint can be closed. This is a concern better addressed outside of the rule making process.

WAC 480-120-106 Form of Bills

U S WEST respectfully requests that the Commission adopt the same rules as those adopted by the FCC in Docket No. 98-170 Truth-in-Billing and Billing Format. The proposed language should be modified for consistency with the FCC rules. U S WEST has not had a chance to compare the FCC's rule with the state rule. Additional information will be provided at a later date on this rule.