

**BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

**UT-990146** )  
Telecommunications Companies ) **COMMENTS OF SPRINT CORPORATION**  
Chapter 480-120 WAC )

Sprint appreciates the opportunity to comment further on the proposed consumer rules as part of the general telecommunications rulemaking. Sprint does not at this time have comments on all the topics set forth by the staff in their minutes of the April 11, 2000, workshop but may provide supplemental comments on the remaining topics in the future.

**480-120-041 Availability of Information**

Sprint believes that its Local Division's newly designed bill format (see attached example) will provide all the information necessary to serve as the "confirming notice" the staff desires. The new bill clearly itemizes all services ordered with their corresponding rates. In addition, there is a section on the bill entitled "Change in Service" that details all changes to the customer's account from the previous billing cycle including any new services added. Finally, each new customer also receives a welcome letter that includes a list of the services and products (without rates) to which the new customer has subscribed.

Sprint continues to advocate the position that these rules should not apply to competitive local providers.

Regardless of whether the customer has electronic payment, or receives a hard copy of the bill, the customer will be able to view the bill on-line to see the change of service, and will continue to receive the welcome letter when a new service is ordered.

Sprint supports the goals of the FCC, NARUC, and consumer advocates to keep customers informed about their service providers and the charges that are included on

their invoices. To minimize customer confusion, and save companies the expense of a non-standardized approach, Sprint urges the Commission to support the national efforts, led by the FCC and NARUC, to address Truth in Billing.

#### **480-120-056 Establishment of Credit**

Sprint appreciates staff's effort to respond to the company's concern about refund of deposits from the business office. However, Sprint's business offices are not equipped so that personnel can issue checks to walk-in traffic. Such a process would be expensive to establish and would reduce the time that personnel are available to answer phones.

#### **480-120-057 Deposit or Security — Resellers**

It is Sprint's position that the rule does apply in today's market. Resellers should not be exempt from deposit requirements. Without such protection Washington rate payers could be harmed. If the reseller defaults, the cost of uncollectibles will rise and ultimately be passed onto to ratepayers. While there may be remedies in reseller contracts, not all resellers enter into contracts with ILECs.

#### **480-120-061 Refusal of Service**

Sprint has previously provided information about the number portability issue and continues to believe that it is not appropriately included in this rulemaking.

#### **480-120-081 Discontinuance of Service**

Sprint appreciates staff's intention to add extra time if a disconnection requires a field visit.

It is Sprint's position that interexchange carriers, competitive local carriers and information service providers are all customers subject to disconnection rules.

A second notice should not be required prior to disconnection. It is hard to imagine many instances in which a customer could not respond to a first notice, but could respond to a second notice. Even when a customer is going to be away from home or

business for an extended period of time, the options to prepay or auto-pay would negate the need for a second notice.

#### **480-120-087 Solicitation**

Sprint urges the WUTC to interpret the statute to permit bill messages as well as bill inserts .

#### **480-120-088 Automatic Dialing-Announcing Devices**

Sprint understands it is not staff's intent to substantially change this rule. However, since telephone companies have no way of knowing whether businesses are using ADADs, the rule should be eliminated.

#### **480-120-101 Complaints and Disputes**

Sprint has no objection to providing customers with information about how to contact the Commission; however, it does not favor Public Counsel's suggestion that customers be provided with such information before the company has a chance to resolve the complaint. Not only would such a practice unnecessarily increase the call volumes into the Commission, but it is unlikely to affect the resolution. Communication is generally best when it is direct, rather than indirect.

#### **Charging for the use of payment agency**

Sprint does not currently permit its payment agents in Washington to charge a fee for their service to the customer. The company, however, believes that such an arrangement may have merit because it would make it much easier to attract payment agents and therefore would increase the number of payment agencies available to customers. There is a possibility that payment agencies could become a secondary market if consumers place a value on the ability to make payments at a greater number of agencies, and would thus be willing to pay an additional fee for the added convenience. For example, many people prefer to use mailing businesses rather than the local post-office.

## **Reasonable Charges by Shared Tenant Service Providers**

Resellers should not be allowed to charge a disconnection charge, since such charges have an anti-competitive effect.

## **Conclusion**

Sprint appreciates Staff's efforts to better understand industry positions on the draft rules through a series of workshops. These discussions have been helpful in interpreting the changes, airing concerns, and debating whether the changes comport with the Governor's objectives: need, effectiveness, efficiency, clarity, intent and statutory authority, and coordination with other agencies. Sprint thanks the Commission for its consideration of Sprint's recommendations contained herein, chiefly Sprint urges the Commission to:

Support national efforts led by NARUC and the FCC on "Truth in Billing" rather than create state-specific rules.

Allow companies to require security deposits on resellers, and disconnect carriers and ISPs that do not pay their bills so that Washington ratepayers are not forced to cover uncollectibles that the telephone company may otherwise incur.

Continue to allow companies an opportunity to resolve customer complaints before referring customers to the Commission.

Consider allowing payment agencies to charge small transaction fees in order to promote a secondary market and provide the public with greater convenience.

Prohibit resellers from assessing disconnection fees since such charges will have an anti-competitive effect.

Respectfully submitted this 12<sup>th</sup> day of May, 2000.

**SPRINT CORPORATION**

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