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November 2, 1990

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Mr. Paul Curl  
Secretary  
Washington Utilities and  
Transportation Commission  
1300 Evergreen Park Drive  
Olympia, Washington 98504

BY FEDERAL EXPRESS

Re: Reply Comments of Integretel, Inc. in  
Docket UT-900726

Dear Mr. Curl:

Please find enclosed an original and 19 copies of the Reply Comments of Integretel, Inc. in Docket UT-900726. We would appreciate it if you would receipt stamp the duplicate copy and return it to our office in the enclosed self-addressed stamped envelope.

If you have any questions concerning this filing, please call the undersigned at (202) 828-3182 or Danny E. Adams at (202) 429-7000.

Respectfully submitted,



Eric W. DeSilva

Encl.

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FEDERAL BUREAU OF INVESTIGATION  
WASHINGTON, D.C.

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BEFORE THE  
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
Olympia, Washington

In Re Proposed Amendments to )  
WAC 480-120-021, -106, -138, and )  
-141 Relating to Telecommunications ) Docket No. UT-900726  
Companies -- the Glossary, Alternate )  
Operator Services, Pay Telephones )  
and Form of Bills )

REPLY COMMENTS OF INTEGRETTEL, INC.

Integretel, Inc., by its attorneys, submits the following Reply Comments on the rule changes proposed by the Notice of Proposed Rulemaking in the above-captioned docket.

Integretel's interest in this proceeding stems from its business as a billing and collection agent for interexchange carriers and pay telephone providers offering operator assisted calling from locations throughout the nation, including the State of Washington. In this regard Integretel is similarly situated to Operator Assistance Network ("OAN") and Zero Plus Dialing, Inc. ("ZPDI") and offers these Reply Comments on the billing aspects of the Notice. Integretel fully supports the joint comments made by OAN and ZPDI in this docket.

Like OAN and ZPDI, Integretel does not oppose the imposition of subcarrier billing requirements (1) where technically feasible (2) at a reasonable cost. Such service is offered by various local exchange carriers throughout the United States at reasonable charges, often for no additional

charge. In all such instances, Integretel utilizes the service.

The rules should be drawn with a recognition, however, that Local Exchange Carrier ("LEC") billing and collection is a monopoly service which cannot be controlled by interexchange carriers, payphone owners or billing agents. Where LECs are technically or economically unable to provide subcarrier billing on reasonable terms, exceptions to the requirement should be permitted. To do otherwise will prevent competitive companies from doing business in some parts of the State and raise their per call cost of providing service in those areas where they can operate. The result could be a loss of competition, along with higher costs and lower quality service to consumers.

Before the rule is enacted, the Commission should conduct a survey to determine which LECs can provide subcarrier billing and the cost of such service. Until this

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analysis is completed, the Commission cannot be sure its proposal is reasonable.

Respectfully submitted,

**INTEGRETEL, INC.**

By *Danny E. Adams (END)*  
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Eric DeSilva  
of  
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Counsel for Integretel, Inc.

November 5, 1990

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