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VIA E-MAIL AND HAND DELIVERY

Carole Washburn

Executive Secretary

Washington Utilities and Transportation Commission

1300 South Evergreen Park Drive SW

PO Box 47250

Olympia, WA 98504-7250

Re: Docket No. UT-990146 – Discussion Draft WAC 480-120-340 and
WAC 480-120-341

Dear Ms. Washburn:

These comments are filed on behalf of the Washington Independent Telephone Association (WITA) pursuant to the Notice of Opportunity to File Written Comments and to Propose Alternative Rule Language dated January 8, 2002.

The draft rule language has been prepared by Commission staff in an effort to meet concerns raised by the Military Department related to certain aspects of the E911 system. Commission staff has met with the Military Department and the industry in an effort to address the Military Department concerns. WITA commends the Commission staff on their efforts.

WITA has participated in the discussion concerning these rules. However, it is still not clear to WITA what precise problem the Military Department feels needs to be addressed. There has been some anecdotal discussion, but no real identification of an unmet need, the extent of that

need and how a Commission rule might address that need. It also appears that, to the extent there may be a problem, it does not exist with WITA's members. Therefore, WITA asks that the rules be drafted in such a way that they do not impose additional costs on WITA's members.

Finally, WITA has made suggested changes to the language of the rule to perhaps aid in its clarity. For example, referring to "customer" rather than "subscriber"; deleting the reference to "point of presence" which may cause some confusion in understanding what that term means in an E911 setting; referring to the offering of service rather than the provision of service; and some consistency in structure and terminology within the rule.

A revised draft of the proposed rule language is attached.

Thank you for your attention to these comments.

Sincerely,

RICHARD A. FINNIGAN

RAF/sle

cc: Members