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COMMISSIONER, WUTC



Allan T. Thoms
Vice President – Public Policy & External Affairs
Northwest Region

Verizon Northwest Inc.
1800 41st Street
P.O. Box 1003
Everett, Washington 98201
Mailcode: WA0101RA

February 25, 2002

Commission Chairwoman Marilyn Showalter
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, Washington 98504-7250

Phone 425 261-5691
Fax 425 261-5262

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STATE OF WASH.
UTIL. AND TRANSP.
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Dear Chairwoman Showalter:

Re: Docket No. UT-990146

Verizon requests that the Commission withdraw its proposed new Customer Information rules from the nearly 100 pages of rule changes that it will consider at its March 27, 2002 open meeting for movement from the CR 101 to the CR 102 stage of this proceeding. Verizon requests that instead the Commission provide a meaningful opportunity for analysis and the exchange of information, concerns and ideas on this important subject.

The Commission first gave notice of these proposed rules on February 14, 2002. They represent a major change in the Commission's current customer information rules and would markedly depart from the Commission's policy of mirroring the Federal Communications Commission rules on the subject. The Commission's February 14 Notice does not even call for written comments on the draft rules. Injecting these major proposals on customer information rules at the last minute of the CR 101 process and then immediately moving them to the CR 102 stage would arguably violate the state's Administrative Procedure Act.

To date, in this large rulemaking docket the Commission has rightly provided parties meaningful opportunities to evaluate proposals, improve their understanding of the issues and exchange ideas through written comments and workshops, and to make thoughtful recommendations to the Commission. The same consideration should be given to the topic of customer information. Therefore, Verizon strongly urges the Commission to withdraw the new proposed Customer Information rules from its March 27, 2002 agenda and to then set a schedule for written comments and at least one workshop.

Very truly yours,

Allan T. Thoms

c: Mr. Glenn Blackmon
Mr. Simon ffitich