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**Theresa Jensen**  
Director – Washington Regulatory Affairs  
Policy and Law

March 11, 2002

Ms. Carole Washburn  
Executive Secretary  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Drive S. W.  
P. O. Box 47250  
Olympia, Washington 98504-7250

Re: Docket No. UT-990146 - Telecommunications Operations (Consumer Rules)  
Attention: Robert Shirley

Dear Ms. Washburn:

I recently received a response from Mr. Shirley concerning Qwest's letter on the Small Business Economic Impact Statement ("SBEIS") requested in Docket No. UT-990146 - Telecommunications Operations. Our letter concerning the Commission's SBEIS request was intended to inform the Commission of our attempt to provide economic impact data as a courtesy since the SBEIS process is specific to small businesses. Qwest typically provides SBEIS data when proposed rule changes are significant for large businesses.

Qwest has a number of questions on the proposed customer information additions/changes which we will raise at the upcoming workshop. We cannot quantify the economic impact of these proposed changes until our questions are addressed. The customer information rules for which we have such questions include the following: WAC 480-120-202, -203, -204, -205, -206, -207, -208, -209, -211 and -213

In addition, a number of proposed changes have major ramifications to our business since they require significant process and technology changes that we cannot quantify in the short interval provided. We must analyze the process changes that must be made and discuss system and technological changes with our vendors before we can quantify the economic impacts associated with the following rules:

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- Operator services rule - WAC 480-120-262: estimated at \$3.5 million or more of additional expense/capital.
- Service quality performance reports - WAC 480-120-535: unable to quantify at this time. There will be additional expense associated with new report requirements.
- E911 Obligations - WAC 480-120-340(2): unable to quantify at this time. There will be additional expense/capital required for new system and process requirements.
- Company responsibility - WAC 480-120-167: unable to quantify at this time as the proposed rule requires a process not in place at this time. Qwest is unable to quantify the number of intercompany disputes it will need to address as a result of this proposed rule.

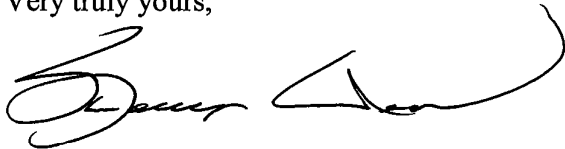
In addition, Qwest continues to be concerned with a number of the proposed rule changes because they are unreasonable in a number of areas unless they are further qualified. The rules of concern include:

- Orders for non-basic service - WAC 480-120-XXY
- Installation/Activation of access lines - WAC 480-120-107(1)(c)
- Restoring WTAP service - WAC 480-120-X32

Qwest estimates \$1 million of increased expense due to proposed WAC 480-120-X08 and \$3 million of increased expense due to proposed WAC 480-120-X40. Finally, Qwest is unable to quantify the amount of penalty the Commission may impose when Qwest is unable to comply with the proposed rule revisions such as those included in WAC 480-120-X13. Qwest respectfully suggests the Commission refrain from adopting the newly proposed rule changes until further discussion can occur with the Commissioners at the upcoming workshop or through written comments. Qwest plans to file written comments on the proposed rule changes prior to the Open Meeting, will provide comments at the Open Meeting and will also file comments as part of the CR-102 process.

If you have any questions, I can be reached at 206-345-4726.

Very truly yours,



*for* Theresa Jensen