

Privacy concerns:

1. Request for Clarification. WAC -021 Definitions does not include the following information in any of the definitions of customer information: emergency medical information, information collected for establishing credit, information collected during a complaint or inquiry, or information collected as part of an investigation to determine customer deception. We suggest language be added to the definition section and to privacy rules. We suggest the following language be added to the definition section.

“Customer history information means any customer specific information collected such as credit history, medical emergency information, dispute or complaint records, and records related to company investigations

Then add “customer account history information” to the appropriate privacy WACs such as in WAC 206 (1) Unless the customer directs otherwise, a company may use a customer’s private account information, with the exception of call detail, and customer account history information.

2. Request for Clarification. Language in WAC -122 Establishing credit – residential and WAC -172 Discontinuing service could be interpreted as encouraging companies to share information. We suggest the following language be added to the end of section (1) in WAC -122 to clarify the commission’s intent.

This rule does not authorize companies to share customer information to determine credit worthiness without a letter of agency from the customer.

In addition, the sentence “This rule does not authorize companies to share customer information.” should be added to section (4) and (8) of WAC -122 and to section (1d) of WAC -172.

Another option would be to also add the following language to section (1) “A company must rely on an applicant’s self-reported information unless the applicant or customer gives permission to the company to access previous customer account information held by another telecommunications company.

3. Request for Clarification: Does the commission intend to include in the privacy rules information collected from applicants denied service? If so add language that extends protection to applicants. We suggest the following language be added to WAC 206-211 after Customer’s private account information, “or an applicant’s information.”

Add a definition to WAC -021 Definitions: “Applicant information means any information collected as part of a customer’s application.”

Sandra Ripley, Seattle Telecom Consortium, Senior Services.

4. We request that the commission add language that recognizes a customer's right to obtain copies of their information on file with the company. This will allow customers to verify information on file. We suggest adding the following language to WAC -061 Refusing Service section 6(a) A customer has the right to obtain copies of the companies records related to their investigation resulting in denial of service.

WAC -021 Definitions used in privacy rules:

new

"Applicant information means any information collected as part of a customer's application."

"Call detail" means any information about a call, including the name of the caller and name of any person called, the area code, prefix, and any part of the telephone number of any participant, and the time of day and duration of a call, and the cost of a call.

new

"Customer history information means any customer specific information collected such as credit history, medical emergency information, and dispute or complaint records, or records related to company investigations"

"Customer proprietary network information (CPNI)" means:

(a) Information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service, including call detail, requested by an applicant or subscribed to by any customer of a company, and that is made available to the company by the customer solely by virtue of the customer-company relationship, which includes information obtained by the company for the provision of the telecommunication service; and

(b) Information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a company; except that CPNI does not include subscriber list information.

"Private account information" means CPNI that is associated with an identifiable individual.

"Subscriber list information (SLI)" means any information:

(a) Identifying the listed names of subscribers of a company and those subscribers= telephone numbers, addresses, or primary advertising classifications (as such classifications are assigned when service is established), or any combination of listed names, numbers, addresses, or classifications; and

(b) That the company or an affiliate has published, caused to be published, or accepted for publication in any directory format.