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September 27, 2005

Mark Sidran, Chairman
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

Philip Jones, Commissioner
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

Patrick Oshie, Commissioner
Washington Utilities and
Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504

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STATE OF WASH.
UTIL. AND TRANSP.
COMMISSION

Re: WECA Docket 02-01 - Phantom Traffic

Dear Commissioner Sidran, Commissioner Jones and Commissioner Oshie:

Enclosed for your consideration is the Report on Phantom Traffic issued in Washington Exchange Carrier Association (WECA) Docket 02-01. This Report describes the problem of Phantom Traffic and suggests possible courses of action to address the issue.

At the core of the Report is a recommendation that the Commission open a docket to consider Phantom Traffic issues and consider the proposed recommendations to address the issues.

Phantom Traffic refers to telecommunications traffic that is delivered for termination to end users without sufficient information present to allow the terminating company to bill the responsible carrier the appropriate terminating charges for that traffic. It is a means by which some carriers can use the public switch telephone network (PSTN) without paying for the cost they impose.

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The primary recommendation from the docket is that the Commission consider adopting "truth-in-billing" standards that require the population of identifying fields for carrier and jurisdiction and make it explicitly improper to alter, exclude, omit or strip carrier and call identifying information. There are several supporting recommendations to help enforce the truth-in-billing standards.

By this letter, WECA, on behalf of Docket 02-01, is requesting that the Commission initiate a docket to consider the recommendations for addressing Phantom Traffic.

Thank you for your attention to this request.

Sincerely,

Handwritten signature of Richard A. Finnigan in cursive script, followed by the initials "/km".

RICHARD A. FINNIGAN

RAF/km
Enclosure

cc: Glenn Blackmon (w/encl.)
Tim Zawislak (w/encl.)
WECA Board (letter only via e-mail)