

**Qwest Corporation**

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Mark S. Reynolds  
Assistant Vice President  
Public Policy & Regulatory Affairs

July 30, 2009

Via E-mail and  
Overnight Mail

Mr. David Danner  
Secretary and Executive Director  
Washington Utilities and  
Transportation Commission  
1300 S. Evergreen Park Dr. S.W.  
P.O. Box 47250  
Olympia, Washington 98504-7250

Re: 2009 ETC Certification: Qwest's 2008 ETC Certification Report and Plan  
for Universal Service Support Expenditures in Accordance with WAC 480-  
120-070 and WAC 480-120-080

Dear Mr. Danner,

In response to the requirements of WAC 480-120-070 Annual certifications and reports  
and WAC 480-123-080 Annual plan for universal service support expenditures, Qwest  
provides the following information. For ease of reading, Qwest will list each of the  
requirements under the rules followed by its response.

**WAC 480-123-070 Annual certifications and reports.** Not later than July 31 of each  
year, every ETC that receives federal support from any category in the federal high-cost  
fund must certify or report as described in this section. The certifications and reports are  
for activity related to Washington state in the period January 1 through December 31 of  
the previous year. A company officer must submit the certifications in the manner  
required by RCW 9A.72.085.

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Confidential per WAC 480-07-160

**Response:** The declarations of Qwest officers certifying the data contained in this filing are in Attachments A1, A2, and A3.

**(1) Report on use of federal funds and benefits to customers.**

(a) For an ETC that receives support based only on factors other than the ETC's investment and expenses, the report must provide a substantive description of investments made and expenses paid with support from the federal high-cost fund.

For ETCs that receive any support based on the ETC's investment and expenses, the report must provide a substantive description of investment and expenses, such as the NECA-1 report, the ETC will report as the basis for support from the federal high-cost fund.

**Response:** In accordance with FCC Docket No. 96-45, Qwest received \$2,447,722 of Interstate Access Support ("IAS") for the state of Washington in calendar year 2008. Although Qwest does not specifically track IAS support to particular construction and maintenance projects, it does certify that the IAS funds were used only for the provision, maintenance and upgrading of facilities and services for which the support was intended (See Attachment A). Qwest's actual expenditures during the certification period for the provision maintenance and upgrading of facilities and services in designated support areas significantly exceeded the \$2,447,722 in IAS support received. Attachment B is a list of the wire centers on which Qwest's IAS support is based.

Qwest's 2008 investments in its wire centers upon which its IAS support is calculated (See Attachment B to Qwest ETC Report), was **\*REDACTED\***. Qwest's 2008 investments for all other wire centers was **\*REDACTED\***. Qwest's investment expenditures through April 30, 2009 in its wire centers upon which its IAS support is calculated total **\*REDACTED\***. Investments in all other wire centers totaled **\*REDACTED\*** as of the same date. These amounts do not include expenses paid in rural or non-rural areas because Qwest does not track those costs below the state level. It can be safely stated that rural areas incur at least as much maintenance expense, per line, as non-rural areas. Total network maintenance expenses (total cost of service excluding access expense) in Washington for 2008 were **\*REDACTED\*** and through April 30, 2008 were **\*REDACTED\***.

A copy of the NECA form that Qwest Corporation filed with National Exchange Carrier Association (NECA) in 2009 pursuant to 47 C.F. R. § 36.611 (data as of December 31<sup>st</sup> of the calendar year 2008 is attached as Attachment C .

(b) Every ETC must provide a substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to (a) of this subsection.

**REDACTED**

**Response:** Through the expenditure of IAS funds, Qwest was able to continue to provide services at a level that meets the requirements of 47 U.S.C. §254 of providing high quality telecommunication services to customers in the service areas for which it receives IAS support. Qwest has made substantial investment over the past several years that allow it to provide quality telecommunication service to its customers in the designated support areas.

(2) **Local service outage report.** ETCs not subject to WAC 480-120-412 and 480-120-439(5) are required to report local service outages pursuant to this subsection. The report must include detailed information on every local service outage thirty minutes or longer in duration experienced by the ETC. The report must include:

- (a) The date and time of onset and duration of the outage;
- (b) A brief description of the outage and its resolution;
- (c) The particular services affected, including whether a public safety answering point (PSAP) was affected;
- (d) The geographic areas affected by the outage;
- (e) Steps taken to prevent a similar situation in the future; and
- (f) The estimated number of customers affected.

**Response:** Qwest is exempt from this requirements as it is subject to WACs 480-120-412 and 480-120-439(5).

(3) **Report on failure to provide service.** ETCs not subject to WAC 480-120-439 are required to report failures to provide service pursuant to this subsection. The report must include detailed information on the number of requests for service from applicants within its designated service areas that were unfulfilled for the reporting period. The ETC must also describe in detail how it attempted to provide service to those applicants.

**Response:** Qwest is exempt from this requirements as it is subject to WAC 480-120-439(5).

(4) **Report on complaints per one thousand handsets or lines.** The report must provide separate totals for the number of complaints that the ETC's customers made to the Federal Communications Commission, or the consumer protection division of the office of the attorney general of Washington. The report must also generally describe the nature of the complaints and outcome of the carrier's efforts to resolve the complaints.

**Response:** Attachment C provides Washington complaints to the FCC and to the Consumer protection division of the attorney general of Washington lines for the years 2004 through 2008. Qwest reports multiple years of data to provide the Commission with a frame of reference regarding Qwest's efforts to reduce complaints. The complaint categories include billing, buried drop, call handling, held order, installation, repair, treatment, and other. Qwest has been successful in its efforts to reduce FCC complaints overall by 36% between 2004 and 2008.

**REDACTED**

Qwest has been successful in reducing attorney general of Washington complaints by 10% between 2004 and 2008. Qwest's success in reducing complaints is a testament to its Spirit of Service commitment which constantly focuses on all improving all aspects of serving our customers.

**480-123-070 (4) Report on complaints per one thousand handsets or lines.**

**In your initial filing, you mentioned the number of complaints to the Federal Communications Commission and to the Office of the Attorney General of Washington filed against your company in 2008(Attachment C). Please provide a summary of the outcomes of your company's efforts to resolve the complaints for each category of complaints.**

**Response:**

First, Qwest would like to clarify that the complaint information provided in Attachment C to its 2008 Annual Certification and Plan Report is the actual number of complaints by category in each reporting period and not complaints per one thousand hand sets or lines.

Qwest's efforts to resolve complaints for all complaint categories are based on the following process:

- Review the complaint to determine the nature of the problem
- Review Qwest's records/data to substantiate the claim
- Determine if Qwest's practices, which may have led to the complaint, are in accord with applicable statutes and rules
- If Qwest determines that its actions/practices that led to the complaint are in accord with applicable statutes and rules, it will provide substantiation for its claim to the investigating agency
- If Qwest determines that its actions/practices that led to the complaint are not in accord with applicable statutes and practices, it will attempt to resolve the problem (i.e., service credits, service repair, etc.)
- If Qwest determines that its actions/practices that led to the complaint are not in accord with applicable statutes and practices, and it is a systemic problem, it will notify the appropriate Qwest business/operation unit to take corrective action to fix the deficient or defective systems or processes.
- In any event, Qwest always works closely with the regulating agencies to quickly resolve customer's service-affecting issues.

Although Qwest does not track how each and every one of its complaints are resolved, the table below provides a breakdown of its 2007 complaints regarding whether the complaint was for an IAS supported service or for other services not supported by IAS funding.

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Washington FCC Escalations				
Subject	2008 - All		2008 - IAS Based	
	Number	Per 1,000 Lines	Number	Per 1,000 Lines
Billing	72	0.039	1	0.001
Call Handling	7	0.004	0	0.000
Commitment/Interval	1	0.001	0	0.000
Installation	0	0.000	0	0.000
Repair	6	0.003	0	0.000
Treatment	5	0.003	0	0.000
Other	34	0.018	1	0.001
Total	125	0.068	2	0.001

Washington AG Escalations				
Subject	2008 - All		2008 - IAS Based	
	Number	Per 1,000 Lines	Number	Per 1,000 Lines
Billing	176	0.095	4	0.002
Call Handling	6	0.003	0	0.000
Commitment/Interval	3	0.002	0	0.000
Installation	2	0.001	0	0.000
Repair	17	0.009	1	0.001
Treatment	22	0.012	0	0.000
Other	83	0.045	4	0.002
Total	309	0.168	9	0.005

(5) **Certification of compliance with applicable service quality standards.** Certify that it met substantially the applicable service quality standard found in WAC 480-123-030 (1)(h).

**Response:** Qwest certifies that in 2008 it substantially met the applicable service quality standard found in WAC 480-123-030 (1)(h). Qwest's officer certification for this section is in Attachment A2.

**REDACTED**

**(6) Certification of ability to function in emergency situations.** Certify that it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g).

**Response:** Qwest certifies that in 2008 it had the ability to function in emergency situations based on continued adherence to the standards found in WAC 480-123-030 (1)(g). Qwest's officer certification for this section is in Attachment A2.

**(7) Advertising certification, including advertisement on Indian reservations.** Certify it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within the ETC's designated service area. Such publicity should include advertisements likely to reach those who are not current customers of the ETC within its designated service area.

**Response:** Qwest certifies that it has publicized the availability of its applicable telephone assistance programs, such as Lifeline, in a manner reasonably designed to reach those likely to qualify for service, including residents of federally recognized Indian reservations within Qwest's designated service area. Such publicity includes advertisements likely to reach those who are not current customers of Qwest within its designated service area. Qwest's officer certification for this section is in Attachment A3.

**WAC 480-123-080 Annual plan for universal service support expenditures.** (1) Not later than July 31 of each year, every ETC that receives federal support from any category in the federal high-cost fund must report on:

(a) The planned use of federal support related to Washington state that will be received during the period October 1 of the current year through the following September; or

(b) The planned investment and expenses related to Washington state which the ETC expects to use as the basis to request federal support from any category in the federal high-cost fund.

(2) The report must include a substantive plan of the investments and expenditures to be made with federal support and a substantive description of how those investments and expenditures will benefit customers.

**Response:** Qwest expects its IAS funding for the specified funding period to be consistent with its funding for the 2008/2009 funding period. Although Qwest does not specifically track IAS support to particular construction and maintenance projects, it does certify that the IAS support it will receive for the next funding period will be used only for the provision, maintenance and upgrading of facilities and services in the designated support areas. Qwest plans to continue to provide services at a level that meets the requirements of 47 U.S.C. §254 of providing

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high quality telecommunication services to customers in the service areas for which it receives IAS support. Qwest will continue to invest in the designated support areas in order to provide high quality telecommunication service to benefit its customers.

Qwest expects its level of IAS funding for the specified funding period to be consistent with its funding for the 2008/2009 funding period (Please see Qwest's response to Staff's inquiry on 480-120-070 (1) regarding current year expenditures).

Please feel free to contact me if you have any questions.

Sincerely,

Mark S. Reynolds

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Confidential per WAC 480-07-160