

September 19, 2007

VIA ELECTRONIC MAIL & FIRST CLASS MAIL

Carole Washburn
Executive Secretary
Washington Utilities & Transportation Commission
1300 S. Evergreen Pk. Dr. S.W.
PO Box 47250
Olympia, WA 98504-7250

Re: In the Matter of the Petition of Qwest Corporation, To be Regulated Under an Alternative Form of Regulation Pursuant to RCW 80.36.135
Docket No. UT-061625

Dear Ms. Washburn:

On September 18, 2007, Qwest filed a copy of the draft public notice required by Order 06, paragraph 19, in this docket. Public Counsel believes that the notice is unacceptable both as to form and content and should not be approved.

Qwest provided a copy of the draft to Public Counsel last week, stating it had already been provided to Staff previously and Staff's feedback had been incorporated. Public Counsel was not advised that the discussion with Staff was occurring. After review, we advised Qwest that we had broad concerns about the format and content of the draft. After we expressed our concerns to Qwest, the Company responded that it was satisfied with its draft notice and the September 18 filing followed.

Qwest is, it appears, unwilling to work with Public Counsel in an effort to reach a mutually acceptable form of notice. There is time for such discussion to occur. The filing of the draft notice is premature, as Qwest's cover letter acknowledges. The order requires that draft notice be provided within 10 days of the final approval of this AFOR. As Qwest points out, that has not yet occurred.

A full review of the shortcomings of the draft notice is beyond the scope of this letter. In summary, however, the content of the notice fails to provide specific and useful detail to customers about how their service is affected, instead speaking in general terms about many key provisions. Furthermore, the letter notice uses legalese and technical jargon that customers will

not understand. The form of the notice, a long single spaced letter in relatively small indistinct typeface is more likely to be discarded and disregarded than read by most customers. The heading states nothing about the subject matter of the notice. The notice uses none of the techniques of print marketing which Qwest uses extensively to make its advertisements for its various services eye-catching, informative, and attractive to the customers.

The AFOR is a major change in regulatory framework with significant impact on customers. It is therefore, particularly important that this notice is seen and understood by customers.

Public Counsel requests that the notice not be approved in the form filed. We further request that the Commission establish a deadline to comment on this notice for a date two weeks after the final approval of the AFOR. This will allow time for Public Counsel to pursue discussions with Qwest to see if our concerns can be addressed.

Sincerely,

Simon J. ffitch
Assistant Attorney General
Public Counsel Section
(206) 389-2055

cc: Service List (E-mail & First Class Mail)
Patricia Clark (E-mail)