BEFORE THE WASHINGTON STATE UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of the Petition of)	DOCKET UT-061625
)	
QWEST CORPORATION,)	
)	ORDER 14
For an Alternative Form of Regulation)	
Pursuant to RCW 80.36.135.)	
)	ORDER ACCEPTING PARTIAL
)	COMPLIANCE FILING, ON
)	CONDITION, AND ALLOWING
)	REVISED RATES TO BECOME
)	EFFECTIVE ON AN INTERIM
)	AND REFUNDABLE BASIS
)	DECEMBER 1, 2007
)	,
)	
	,	

Synopsis: The Commission accepts Qwest's partial compliance filing subject to conditions; allowing a temporary increase in residential stand-alone rates of \$1.00 per month, subject to refund, eliminating the Directory Assistance Call Allowance, and modifying the Customer Service Guarantee Program. These changes take effect December 1, 2007, which is deemed to be the effective date of the Alternative Form of Regulation (AFOR). We require Qwest to submit a filing that fully complies with the terms and conditions of Order 06 by February 1, 2008, or the temporary rate increases authorized by this Order will be rescinded and the increased monies collected thereunder will be refunded to customers.

BACKGROUND

On July 24, 2007, the Washington Utilities and Transportation Commission (Commission) entered Order 06 in this proceeding authorizing Qwest Corporation (Qwest) to implement an alternative form of regulation (AFOR) of telecommunications services.

- 2 On October 25, 2007, Qwest submitted an initial compliance filing which:
 - Moved services that would be treated as competitively classified services from its WN U-40 Exchange and Network Services Tariff to the Exchange and Network Services Catalog posed on Qwest's web site;
 - Introduced a WN U-45 Exchange and Network Services Tariff replacing the WN U-40 tariff in its entirety;
 - Withdrew the WN U-39 Advanced Communications Service Tariff and moved those services to a catalog posted on Qwest's web site; 1 and,
 - Withdrew the WN U-41 Private Line Transport Services Tariff and moved those services to a catalog on Qwest's web site.²
- Pursuant to the terms of the AFOR, Qwest notified the Commission that it would increase the rate for stand-alone residential basic exchange service by \$1.00 and eliminate the residential Directory Assistance Call Allowance. Qwest requested that the rate and tariff changes be effective December 1, 2007. Notice to customers of the rate changes was to be provided by November 1, 2007.
- On November 9, 2007, Qwest filed replacement pages of documents that were inadvertently omitted from its October 25, 2007, compliance filing.
- 5 On November 26, 2007, Qwest filed a replacement compliance filing which:
 - Moved certain services from the WN U-40 Exchange and Network Services Tariff to a catalog on Qwest's web site;
 - Withdrew the WN U-39 Advanced Communications Service Tariff and the WN-41 Private Line Transport Services Tariff and moved these services to a catalog on Qwest's web site;
 - Stated that Qwest would file informational copies of the catalogs to which these services would be transferred; and,
 - Increased the rate for stand-alone residential exchange service by \$1.00 a month and eliminated the residential Directory Assistance Call Allowance.

¹ In a separate transmittal, Qwest filed, for informational purposes only, copies of the catalogs to which services would be transferred.

² See n. 1

Also on November 26, 2007, in a related filing, Qwest provided for informational purposes only, replacement pages for changes to the three catalogs to which services were being moved.

- On November 29, 2007, Qwest filed replacement pages for the WN U-40 tariff revising the tariff filed on November 26, 2007 and filed informational copies of new catalogs for competitive service offerings.
- On November 29, 2007, Public Counsel filed comments regarding the replacement compliance filing stating that it had not been served with the initial October 25th compliance filing, now withdrawn. On November 21, 2007, Qwest notified Public Counsel of the earlier filing, the failure to serve, and the impending withdrawal of that filing to be replaced by a new compliance filing. On November 27, 2007, Qwest served Public Counsel, and the parties met on November 29, 2007 to discuss the replacement filing. Public Counsel asserted that while that meeting was helpful, given the short amount of time for review, Public Counsel does not take a position as to the merits of the compliance filing.
- On November 30, 2007, Staff filed comments³ on Qwest's replacement compliance filing. Staff asserted that Qwest replaced its initial filing after discussions with Staff with a filing that retained Tariff WN U-40 instead of replacing it in its entirety and moved a limited subset of services from the tariff to Catalog 2. The affected services include business services, package services, and custom calling features. These services will be treated as competitively classified. Staff observed that the current prices for Qwest package services are not in complete compliance with Order 06⁴ regarding the pricing of packages. However, Qwest stated that it will ensure that customers purchasing its packages do not pay more for services than if they were ordered *a la carte* and will work cooperatively with Staff to file a compliance plan for this provision of Order 06.
- Qwest informed Staff that it will make additional filing(s) in December, 2007, that will be in compliance with Order 06. Staff understands that the purpose of the additional filing is to subject the entire Qwest Washington Exchange and Network Services Tariff in WN U-40 to revisions and changes. Staff believes that many services, definitions of the services, and terms and conditions currently in the tariff may be disputed as to whether Order 06 permits Qwest to move these services from

³ Also on November 30, 2007, Staff filed an errata correcting one error in the comments.

⁴ ¶81, Order 06, entered July 24, 2007.

tariff to catalog. Staff understands that Qwest intends to refile its October 25, 2007, initial compliance filing except for those filings included in the November 26, 2007, submission. Accordingly, Staff refers to the current filing as a partial compliance filing. Qwest also informed Staff that it will file tariff revisions to its Access Tariff N-44 in December 2007.

Staff asserts that even though Qwest's replacement pages for tariff revisions in WN U-40 and the catalog were not filed until November 29, 2007, and that the filing exceeded 800 pages, it was able to reach a preliminary conclusion that the filing was partially compliant with Order 06. Staff recommends the Commission approve the partial filing with an effective date of December 1, 2007. In view of the greatly abbreviated time available for review, Staff also recommends that the Commission preserve, to the extent possible, an opportunity for corrections should discrepancies arise in the course of a limited, but reasonable review period. ⁵

DISCUSSION

- The AFOR statute grants the Commission broad authority to modify the regulatory framework of telecommunications companies seeking relief from traditional rate of return/rate base regulation⁶.
- In Orders 06 and 08, we approved an AFOR plan for Qwest providing the Company increased flexibility to respond to its competitive environment while preserving certain aspects of regulation where necessary to protect consumers. As a result, many of Qwest's services that have traditionally been provided through tariff will now be available through and governed by price lists or catalogs maintained by the Company. Qwest's compliance filings document the migration of these services to a more flexible regulatory environment, as well as other regulatory changes expressed in our order.
- As with other compliance filings, we rely primarily upon Staff and other parties to assess the adequacy of Qwest's filings to assure that the terms and conditions expressed in Orders 06 and 08 have been satisfied. Having completed its preliminary review of Qwest's compliance documents, Staff concluded that the Company

⁵ See Commission Staff's Comments on Qwest's Compliance Filing of November 26, 2007, submitted November 30, 2007.

⁶ See RCW 80.36.135.

reasonably satisfied many, but not all, of the requirements of Orders 06 and 08. It urges us to approve Qwest's filing and preserve a reasonable opportunity for continued review and to take corrective actions, if necessary.

- As is apparent from the procedural history described above, a substantial amount of work and perhaps some confusion has surrounded the efforts of Qwest and Staff to meet the December 1, 2007 deadline they agreed upon for the compliance filings necessary to implement Orders 06 and 08. Despite their collective best efforts, they ultimately were unable to agree upon a fully compliant filing.
- The issue before us is whether and to what extent we should accept the partial compliance filing of November 29, 2007 as urged by both Qwest and Staff.⁷
- Compliance filings are governed by WAC 480-07-880 and WAC 480-07-883. In particular, WAC 480-07-883(3)(b) provides, "The commission may enter an order

⁷ We note that the challenges the parties confronted in meeting their own deadline now burden us with one day to enter an order that would meet their deadline. Despite the temptation to simply defer our decision until a complete compliance filing is made, we believe the public interest is better served by advancing the AFOR process, even if incrementally. Nonetheless, we put the parties on notice that future filings must be made with sufficient time for the Commission to perform it duties within the normal course of business.

WAC 480-07-880

Compliance filing; subsequent filing; reporting requirement.

- (1) **Compliance filing; compliance order.** When the commission enters a final order that authorizes or requires a party to make a filing to implement specific terms of the order with respect to the issues resolved in an adjudicative proceeding by implementing a precisely defined result, the filing is a "compliance filing." For example, a commission final order in a general rate proceeding may authorize or require a party to file original or substitute tariff sheets to implement the terms of the final order. A compliance filing is made under the docket number of the final order to which it relates. A compliance order is an order approving or rejecting a compliance filing.
- (2) **Subsequent filing.** When the commission enters a final order that authorizes or requires a party to make a filing to implement general instructions (e.g., the formulation of policy, or filing of tariffs other than to implement a precisely defined result), the filing initiates a new proceeding that will be assigned a new docket number, and the filing is deemed a "subsequent filing." For example, a commission final order in a complaint proceeding may authorize or require a party to make a tariff filing by a date certain.
- (3) **Reporting requirement.** The commission may enter a final order that requires a party to report periodically to the commission with respect to designated subject matter. The reports must be filed under the docket number of the proceeding in which the final order is entered, unless otherwise specified in the order establishing the requirement or by later letter from the secretary of the commission.

WAC 480-07-883

Compliance filing — Filing requirements; timing; commission action.

A party must strictly limit the scope of its compliance filing to the requirements of the final order to which it relates. If the commission finds that a compliance filing varies from the requirements or conditions of the order authorizing or requiring it, either by falling short of or by exceeding the authorization, conditions, or requirements of the order, the commission may reject the filing unless it has preapproved the variance. If the commission accepts in error a compliance filing that does not comply with the order authorizing the filing, the commission's acceptance does not validate the noncompliant elements of the filing.

(1) Filing requirements.

- (a) A party who files a compliance filing must make its filing consistent with the filing requirements of the docket authorizing the filing, i.e., file the required number of copies, and serve the filing on all other parties in the docket.
 - (b) A compliance filing must include the following:
 - (i) A cover letter that identifies the order to which the filing relates;
 - (ii) All required tariff sheets; and
 - (iii) Work papers that clearly demonstrate the derivation of the proposed tariffs.
- (2) **Service requirement.** A party who makes a compliance filing must serve it on each party to the proceeding in which the compliance filing is authorized or required. Service must be initiated on the same day as the filing.

(3) Timing; effective date.

- (a) The commission will state in its final order authorizing or requiring a compliance filing the date by which the compliance filing must be made and the effective date that should appear on any tariff sheets that are required as part of a compliance filing. The commission may state the amount of time it will require to examine any proposed compliance tariff sheets between their filing and their proposed effective date.
- (b) A compliance filing does not become effective automatically on its stated effective date. Commission action is required before any compliance filing can be effective. The commission may enter an order approving a compliance filing or taking other appropriate action. The commission may delegate to the secretary, by written authorization in individual proceedings, the authority to approve or take other appropriate action with respect to a compliance filing.

(4) Commission action on compliance filing.

- (a) The commission may enter an order in any proceeding in which a compliance filing is authorized or required that:
 - (i) Approves the compliance filing; or
 - (ii) Rejects a compliance filing or any portion of the filing that apparently fails to comply.
 - (b) If the commission rejects all or part of a compliance filing, the party may refile. The commission

approving a compliance filing <u>or taking other appropriate action.</u> (Emphasis supplied). WAC 480-07-883 (4) provides that the Commission may approve or reject all or any part of a compliance filing and may impose conditions on a refiling of a rejected compliance filing.

- Here we have a partial compliance filing with a promise of full compliance to come in a future filing. Although this precise circumstance is not addressed by our rules, we find that when read together WAC 480-07-880 and WAC 480-07-883 provide the flexibility to permit us to conditionally approve a partial compliance filing.
- As discussed in Order 06, the purpose and intent of the AFOR statute⁹ is to promote effective competition, reduce unnecessary regulation and protect consumers by assuring service quality and fair prices without relying upon traditional rate of return/rate base regulation. The AFOR plan we authorized is a carefully balanced effort to accomplish these goals, which requires that all of its elements be implemented. In effect, the partial compliance filing requires us to determine whether piecemeal implementation of the AFOR plan maintains the necessary balance of interests and in particular adequately protects consumers.
- In Order 06, we determined an increase of <u>up to</u> \$1.00 a month in the rate for standalone residential exchange service <u>over the four year term of the AFOR</u> was reasonable as part of the overall plan. Qwest did not seek nor did we authorize a specific increase in this rate to take effect by a date certain. While a \$1.00 increase on December 1, 2007 may be reasonable, it is not required by Order 06. Nor are the other tariff changes authorized in Order 06, such as ending the Directory Assistance Call Allowance, required to take effect by a date certain. Thus, it would not be unfair or unreasonable to simply reject the partial compliance filing and require full compliance before any part of the AFOR plan takes effect.
- On the other hand, we recognize the due diligence of both Qwest and Staff in their efforts to file a fully compliant pleading. It has also been our practice to accord

may impose conditions on refiling.

⁽c) If the commission approves a compliance filing, but later discovers that it failed to recognize that the compliance filing was, in fact, incomplete or did not fully comply with the order authorizing or requiring the filing, the commission may take any necessary and lawful steps to secure full compliance.

⁹ RCW 80.36.135.

substantial weight to Staff's opinion as to whether a filing is compliant or not. Here Staff's "preliminary conclusion" is that the partial compliance filing is "partially compliant" and that it can be approved without "substantially harming customers".

- Although it is a close question, we are satisfied that the partial compliance filing can be approved with conditions that preserve the balance in the AFOR plan contemplated by Order 06 while adequately protecting consumers pending a fully compliant filing. These conditions should result in a relatively short period of time until a full compliance filing is made and provide that Qwest does not retain all of its benefits under the AFOR plan if it fails to meet its obligations under the plan.
- Therefore, as a condition of approving the partial compliance filing of November 29, 2007 we require Qwest to make a fully compliant filing by February 1, 2008. The \$1.00 a month increase in the rate for stand-alone residential exchange service is authorized as a temporary rate increase only, which shall expire on February 1, 2008 and is subject to refund if a fully compliant filing is not filed by that date. The same treatment shall be afforded the rate(s) of any other service or group of services subject to the AFOR and referenced in the Company's compliance filings or the catalogs to which tariffed services were transferred.

FINDINGS AND CONCLUSIONS

- 24 (1) The Washington Utilities and Transportation Commission is an agency of the state of Washington vested by statute with the authority to regulate rates, regulations, practices, accounts, securities, and transfers of public service companies, including telecommunications companies. *RCW* 80.01.040, *RCW* 80.04, *RCW* 80.08 and *RCW* 80.12, *RCW* 80.28.
- Qwest Corporation (Qwest) is engaged in the business of furnishing telecommunications service for hire, sale, or resale to the general public for compensation within the state of Washington.
- Order 06 in this proceeding accepted, subject to conditions, the multi-party Settlement Agreement and modified alternative form of regulation.

- Qwest filed a replacement compliance filing on November 26, 2007, that was further revised by filings submitted November 29, 2007.
- 28 (5) Qwest's partial compliance filing was voluminous and required extensive review in an abbreviated time period.
- Qwest's filings partially comply with the requirements of Order 06 entered in this proceeding. The Commission finds it reasonable to allow the revised rates filed on November 26, 2007, to become effective December 1, 2007, subject to condition.
- The changes in Qwest's partial compliance filing should become effective as interim rates subject to refund if Qwest does not submit a compliance filing that fully implements all the terms and conditions of the Commission's Orders in this proceeding.
- The Commission Secretary should be authorized to accept by letter, with copies to all parties to this proceeding, a filing that complies with the requirements of this Order. *WAC 480-07-170; WAC 480-07-880*.

ORDER

THE COMMISSION ORDERS:

- The partial compliance filings submitted by Qwest Corporation on November 26, 2007 (Transmittal Number 3635T, Replacement No. 3), as revised by a filing dated November 29, 2007 (Transmittal Number 3635T, Replacement No. 4), are approved, subject to condition.
- The revised rates filed by Qwest Corporation on November 26, 2007, should be allowed to become effective December 1, 2007, subject to condition.
- The deadline for Qwest Corporation to file all tariff revisions required by Order 06 in this proceeding is February 1, 2008. Failure to submit a filing that fully complies with Order 06 will result in rescission of the rate increases permitted by this Order and will require refunds to customers.

The Commission Secretary is authorized to accept by letter, with copies to all parties to this proceeding, a filing that complies with the requirements of this Order.

DATED at Olympia, Washington, and effective November 30, 2007.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

MARK H. SIDRAN, Chairman

PATRICK J. OSHIE, Commissioner

ATTACHMENT

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 UT-061625.

TAFIFF SHEETS FILED IN PARTIAL COMPLIANCE WITH THE COMMISSION'S ORDER NO. 06 IN DOCKET UT-061625

WN U-40, Exchange and Network Services Washington (Transmittal No. 3635T, Replacement No. 3):

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