

August 14, 2006

To: Qwest Corporation (Qwest)

From: Bob Shirley, Telecommunications Policy Analyst
(360) 664-1292

Re: Request for Supplemental Filing of ETC Certifications and Reports
Docket UT-063052

- - VIA Electronic Mail - -

After review of Qwest's ETC certification and reports, commission staff has concluded that the filing is inconsistent with the requirements of WAC 480-123-020 through 080. Please file a replacement or supplement consistent with the attachment to this e-mail.

Certifications are due to the Federal Communications Commission and the Universal Service Administrative Company not later than October 1. Commission staff plans to request commission approval of certifications at the open meeting scheduled for September 13. In order to make a recommendation on September 13, commission staff will need to receive replacement or supplemental filings not later than August 22. Commission staff will work closely with Qwest and its representatives so that filings can be completed not later than August 22.

Please contact me by e-mail at bshirley@wutc.wa.gov or by calling (360) 664-1292 if you have questions. Thank you.

Attachment: ETC Certification and Report Request

cc: Records Center, UT-063052

ATTACHMENT

Qwest Corporation (Qwest) ETC Certification and Report Request

WAC 480-123-060(1)

Qwest did not request certification by the WUTC to the Federal Communications Commission.

Qwest is not required to request this certification. Qwest may do so if it chooses to do so. If Qwest chooses to do so, the rule requires that each “ETC must-certify that it will use federal high-cost universal service fund support only for the provision, maintenance, and upgrading of the facilities and services for which the support is intended. The certification must be submitted by a company officer in the manner required by RCW 9A.72.085.”

WAC 480-123-070(1)(a)

Qwest needs to provide a substantive description of investments made and expenses paid with support received, as required by the Commission’s rule.

Qwest provided a history of the creation of IAS as a part of the federal high-cost fund. The rule requires that ETC’s must provide “a substantive description of investments made and expenses paid with support from the federal high cost fund.” Because IAS is support from the high-cost fund, Qwest must report as the rule requires. Substantive is defined in WAC 480-123-020.

WAC 480-123-070(1)(b)

Qwest needs to provide a substantive description of the benefits to consumers that resulted from the investments and expenses reported pursuant to subsection (1)(a) of this section.

Qwest did not provide a substantive description of the benefits to consumers. Substantive is defined in WAC 480-123-020.

WAC 480-123-070(5)

Qwest needs to provide this certification in the past tense as required by the rule.

WAC 480-123-070(6)

Qwest needs to provide this certification in the past tense as required by the rule.

WAC 480-123-080

Qwest needs to report the planned use of federal support, including 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.

Qwest provided a history of the creation of IAS as a part of the federal high-cost fund. The rule requires that ETC's must provide 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.