

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

PETITION OF QWEST CORPORATION  
FOR AMENDMENT OF ONE PROVISION  
OF 12<sup>TH</sup> SUPPLEMENTAL ORDER

Docket No. UT-970766

QWEST CORPORATION'S PETITION  
FOR AMENDMENT OF ONE PROVISION  
OF THE 12<sup>TH</sup> SUPPLEMENTAL ORDER

1 Pursuant to WAC 480-120-015 and RCW 80.04.210, Qwest Corporation ("Qwest") hereby petitions the Washington Utilities and Transportation Commission ("Commission") for an amendment to one requirement of the 12<sup>th</sup> Supplemental Order in this docket, and by a separate and related petition of today's date, requests an exemption from certain provisions of WAC 480-120-255(3). Qwest respectfully requests that the Commission expedite these matters for consideration.

**THE ORDER**

2 On August 29, 1997, U S WEST Communications, Inc. (U S WEST), (now Qwest), filed certain tariff revisions designed to effect a statewide increase in its rates for intrastate telephone service under Docket No. UT-970766. The Commission subsequently suspended the tariff revisions pending investigation and hearing as to whether the proposed rates are fair, just, reasonable, and sufficient. In the 12<sup>th</sup> Supplemental Order in Docket UT-970766, the Commission determined that U S WEST would be required to notice customers every six months about the availability of the then newly adopted Customer Service Guarantee Program ("CSGP").

## RELIEF REQUESTED

3 Qwest seeks an amendment to the 12<sup>th</sup> Supplemental Order in Docket UT-970766 so that Qwest is permitted to provide an annual notice to customers about the availability of the CSGP, but is not required to notice customers every six months.

## DISCUSSION

4 Qwest continually evaluates its operating processes in order to increase efficiency, reduce expenses, and find more effective ways to provide high quality service to its customers. Because sending customers notices about its business represents a significant expense to Qwest,<sup>1</sup> Qwest periodically reviews its notice requirements to determine the opportunity for notice consolidation or if more economically efficient methods of noticing customers might be employed. Upon review of its statutory notice requirements for Washington, Qwest finds that it has the following requirements:

<u>Notice Topic</u>	<u>Source of Notice Requirement</u>	<u>Frequency/Type of Notice</u>
CSGP	12 <sup>th</sup> Supp. Order, Docket UT-970766	bi-annual / combined
Local Service Freez	WAC 480-120-147(5)	annual / combined
Information Service Blocking	WAC 480-120-255(3)	annual / single
No Solicitation - Non Pub / List	WAC 480-120-217/218	annual / combined

5 To gain optimal efficiency and expense reduction, Qwest would like to combine all the notices on one annual bill insert. To be allowed to do this, Qwest would require an amendment to the semi-annual requirement for the CSGP notice from the 12<sup>th</sup> Supplemental Order in Docket UT-970766 (and allow it to file the notice annually). Qwest also would require a waiver of the single bill insert requirement for the Information Service Blocking notice from WAC 480-120-255(3), as set forth by separate petition, filed in conjunction with this petition.

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<sup>1</sup> The cost to send out a single bill insert in Washington is approximately \$15,000.

6 In support of its request, Qwest notes that when the semi-annual CSGP notice was initially ordered by the Commission in 1998, use of the Internet was significantly less prevalent than it is today. Today, Qwest posts the CSGP at its website which is accessible by most of its customers. Further, Qwest is willing to post at the same website its combined notice including not only the CSGP notice, but also the notices about local service freeze, information service blocking and no solicitation – non list/non pub. This means that in addition to the combined annual notice, customers would have access to the consumer information all year long.

7 It should also be noted that in addition to requiring a single-topic bill insert to inform customers of information delivery services blocking, WAC 480-120-255(3) also requires the publication of a notice in a conspicuous location in the consumer information pages of the local white pages telephone directory. Qwest believes that its offer to include the blocking service notice on its web-site in addition to including it in an annual combined notice and in the consumer information pages of the telephone directory provides sufficient notice for this consumer service.

### CONCLUSION

8 Qwest respectfully asks the Commission for an amendment to the requirements of the 12th Supplemental Order as set forth herein.

DATED this 14th day of September, 2006.

QWEST

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