

1 **Q. IF THE BENEFIT OF AND RATIONALE FOR IMPUTATION IS**
2 **DIMINISHED UNDER MARKET BASED PRICING, SHOULDN'T THE**
3 **COMMISSION DISPOSE OF THE RATEPAYER INTEREST**
4 **IMMEDIATELY WHILE THERE IS STILL SOME VALUE?**

5 A. No. The Commission decision to adopt imputation of directory revenues was
6 intended to protect the ratepayer from any harm associated with the transfer of the
7 business to an affiliated company. The ratepayer is not harmed by the termination
8 of imputation when competitive alternatives exist that allow the customers to
9 choose among multiple providers for the telecommunications services they desire.

10 However, although local markets in Washington are open to competition,
11 competitors may not yet have entered all markets and all consumers may not yet
12 be enjoying the benefits of a fully competitive market. The ~~five~~ ~~eight~~-year period
13 is a reasonable transition which allows the Commission to balance the interest of
14 the ratepayers, shareholders, and the broader public by adopting a resolution of
15 imputation that is fair, that preserves affordable service for those ratepayers that
16 do not yet have choice, that ensures continued efficient and reliable service for
17 Qwest ratepayers and that phases out imputation as customers gain a choice of
18 alternative providers.

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20 **Q. WHAT DO YOU MEAN WHEN YOU SUGGEST THAT RESOLUTION**
21 **OF THIS TRANSACTION ALLOWS QWEST AND ITS RATEPAYERS**
22 **TO AVOID FUTURE RISK AND UNCERTAINTY?**

23 A. Another factor the Commission should consider is that ratepayers have received the
24 benefit of imputation since 1984, and have received the benefit of the growth in that
25 business through increased imputation. During that time, as now, Qwest has been free to
26 sell the business. The fact that it did not sell the business allowed ratepayers to