

**Exhibit No. ___-T (KMR-1T)
Docket No. UT-061625
Witness: Kristen M. Russell**

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

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

TESTIMONY OF

Kristen M. Russell

**STAFF OF
WASHINGTON UTILITIES AND
TRANSPORTATION COMMISSION**

REGARDING SERVICE QUALITY

January 29, 2007

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1 I. INTRODUCTION

2

3 **Q. Please state your name and business address.**

4 A. My name is Kristen M. Russell. My business address is 1300 South Evergreen Park
5 Drive Southwest, P.O. Box 47250, Olympia, Washington, 98504. My business e-
6 mail address is krussell@wutc.wa.gov.

7

8 **Q. By whom are you employed and in what capacity?**

9 A. I am employed by the Washington Utilities and Transportation Commission
10 (Commission) as a Regulatory Analyst for the Telecommunications Section. My
11 participation in this case is on behalf of the Commission's Staff (Staff).

12

13 **Q. What are your educational and other qualifications?**

14 A. I began my career with the Commission in September 1990. I received a Bachelor of
15 Arts degree, with an emphasis in accounting, from The Evergreen State College in
16 1994.

17 In September 1999, I took a position with the Telecommunications Section of
18 the commission as a Regulatory Analyst and have worked on various
19 telecommunications-related issues. I review service quality reports that are
20 submitted to the Commission. I have presented recommendations to the
21 Commission on rulemakings regarding the Washington Telephone Assistance
22 Program (WAC 480-122) and the cessation of telecommunications service (WAC

1 480-120-083), as well as recommendations for alternative measurement or reporting
2 formats related to service quality.

3 I am responsible for collection, analysis, and reporting of telecommunication
4 service quality data. I maintain the service quality data on the agency's Web site¹. I
5 provide external technical assistance for companies on service quality matters.
6

7 **Q. What is the purpose of your testimony?**

8 A. I am providing testimony regarding Qwest's request for waiver of the service quality
9 rule (WAC 480-120-439) and requirements, as well as the status of Qwest
10 Corporation's (Qwest or Company) service quality in the state of Washington.
11

12 **Q. Have you previously filed testimony?**

13 A. Yes. I filed service quality testimony in Docket UT-040788, Verizon Northwest
14 Inc.'s general rate case.
15

16 II. SUMMARY

17

18 **Q. Please summarize your testimony.**

19 A. I provide an overview of the Commission's service quality rules. I provide analysis
20 and recommendations concerning provisions and transition period requirements
21 regarding Qwest's modified AFOR proposal and proposed service quality rule and

¹<http://www.wutc.wa.gov/webdocs.nsf/0492664a7ba7ed8b88256406006bf2ca/1620e4a64b072a818825680100788d78!OpenDocument>

1 order waivers. I review and analyze Qwest’s service quality reports filed with the
2 Commission and discuss how the Company is performing with respect to these rules.

3 The requested waivers and Staff’s recommendations are shown in the table
4 below.

Rule or Order to be Waived	Recommendation	Conditions
Service Quality		
WAC 480-120-439 Service quality performance reports (at end of four years)	Deny	N/A
Customer Service Guarantee Program		
17 th Supplemental Order in UT-991358 Order Directing Qwest to File Customer Service Guarantee Reports	Grant in part	Report Quarterly in lieu of Monthly

5
6 The current rule requires that Class A² companies report the information
7 required in WAC 480-120-439³.

8 Based on my review and analysis, I conclude that: 1) Qwest’s service quality
9 is about the same as it has been over the last three years; 2) the rule is not onerous;
10 and 3) Qwest’s overall complaints to the commission are on the decline but are still
11 at a level that substantiates the need for monthly reporting.

12 The statute, RCW 80.04.530, is very clear that the threshold for regulatory
13 exemptions-reporting requirements is two percent of the state access lines. Qwest
14 serves over half of the access lines in Washington – approximately 55.2 percent of
15 the state access lines - well above the two percent benchmark.

² Class A companies are those with two percent or more of the state access lines. For 2006, the benchmark is approximately 71,500 access lines. Class A or B designation is based on regulated sector data, and does not include information on DSL, cable, VOIP, and wireless services.

³ Class B companies are only required to retain records for determination of the company’s compliance with service quality standards. Designation is based on the percentage of state access lines served by that company – this benchmark is two percent.

1 Staff believes it would be a great disservice to the ratepayers of Washington
2 for the Commission to waive the reporting requirements of WAC 480-120-439(1), a
3 rule that offers staff the opportunity to monitor Qwest's service quality on a monthly
4 basis. This monthly report allows Staff to watch for trends that could have a
5 negative impact on customers and react more quickly and effectively to resolve a
6 problem. At the end of the four-year transition period, the Commission can evaluate
7 whether monthly reporting is warranted.

8 Therefore, Staff recommends denying Qwest's request for waiver of WAC
9 480-120-439(1) as part of the Company's petition for AFOR.

10 The Customer Service Guarantee Program (CSGP) is a program the
11 Commission ordered Qwest to implement in Docket UT-950200, due to Qwest's past
12 poor service quality record. The program pays credits for missed appointments and
13 commitments, alternatives for delayed primary service and an allowance for service
14 interruptions. The reporting of this data enables staff to monitor credits the company
15 pays to affected customers for missed appointments and commitments. Because the
16 report is not required of other companies, but is nonetheless valuable to Staff, Staff
17 recommends granting Qwest's petition in part by requiring only quarterly reporting
18 in lieu of monthly reporting.

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**III. QWEST’S PETITION FOR
ALTERNATIVE FORM OF REGULATION**

Q. What does RCW 80.36.135 require the Commission to consider in determining the appropriateness of a proposed alternative form of regulation (AFOR)?

A. In addition to other considerations, RCW 80.36.135(2)(d) requires the Commission to consider whether the AFOR will “preserve or enhance service quality and protect against the degradation of the quality or availability of efficient telecommunications service.”

Q. Does Qwest’s petition for AFOR request a waiver of the service quality rule?

A. Yes. Qwest’s petition for AFOR requests that the commission immediately grant a waiver of WAC 480-120-439(1) – monthly service quality reporting - that would take effect at the end of the four-year transition period. Qwest also asks to be treated, for reporting purposes, as a competitively classified company at the end of the four-year transition period. Qwest will continue to report service quality information on a monthly basis as required by the rule during the four-year transition period.

After the transition period, instead of submitting the monthly service quality reports, as required by WAC 480-120-439(1), the company would merely produce and retain service quality records as required by WAC 480-120-439(2).

1 **Q. What is Qwest’s rationale for this request?**

2 A. In Qwest’s direct case, the Company’s service quality witness, Mr. Reynolds, claims,
3 “Qwest faces pervasive competition from wireless providers and cable companies for
4 its residential exchange service, features and long distance.” Exhibit No. ___ MSR-
5 1T, page 3, lines 14 to 16. Mr. Reynolds also states, “. . . Qwest is required to
6 comply with financial and service quality regulations and reporting requirements.
7 Such regulations forces (sic) Qwest to incur monitoring and reporting costs that are
8 not borne by its competitors.” Exhibit No. ___ MSR-1T, page 4, line 24 to Page 5,
9 line 2.

10 Other than these statements, Qwest provided no analysis or evidence of the
11 costs associated with the monthly reporting requirements.
12

13 **Q. Does Qwest make any other requests related to service quality?**

14 A. Yes. Qwest also asks to be relieved of the reporting requirements in the Seventeenth
15 Supplemental Order in Docket UT-991358. This report pertains to Qwest’s offering
16 of its Customer Service Guarantee Program (CSGP), which I discuss later in my
17 testimony.
18

19 **IV. BACKGROUND:**
20 **SERVICE QUALITY REPORTING RULES**
21

22 **Q. Which Commission rules regarding service quality are applicable to Qwest?**

23 A. Qwest is subject to the service quality reporting requirements in WAC 480-120-439,
24 as well as being subject to performance standards found elsewhere in Chapter 480-

1 120. See Exhibit No. ____ (KMR-2) for the text of these rules, and Exhibit No. ____
2 (KMR-3) for a condensed version of WAC 480-120-439 and related performance
3 standards rules.

4

5 **Q. Briefly describe the areas of service quality the Commission monitors for**
6 **telecommunications companies such as Qwest.**

7 A. The Commission generally monitors all areas of service quality but tracks
8 information on missed appointments, installation of basic service, trouble reports,
9 trunk blockage, switching, out-of-service interruptions or impairments, and
10 complaints. It is important to note that the Commission does not monitor service
11 quality data on wireless, DSL, cable, or VOIP services.

12

13 **Q. For purposes of service quality reporting, what is a trouble report, and how is it**
14 **reported to the Commission?**

15 A. A trouble report (TR) is “. . . a report of service affecting network problems reported
16 by customers, and does not include problems on the customer’s side of the SNI
17 [standard network interface].” WAC 480-120-021. The Company’s monthly report
18 to the Commission must include the number of trouble reports by central office and
19 the number of lines served by the central office. Trouble reports must be presented
20 as a ratio per 100 lines in service.

21 The standard for trouble reports by central office must not exceed four
22 trouble reports per 100 access lines for two consecutive months, or four trouble
23 reports per 100 access lines for four months in any one 12-month period.

1

2 **Q. What is an out-of-service interruption?**

3 A. An out-of-service interruption is a condition that prevents the use of the customer's
4 telephone exchange line for purposes of originating or receiving a call. It does not
5 include trouble reported for non-regulated services such as voice messaging, inside
6 wiring or customer premise equipment.

7

8 **Q. What are trunks, and what is trunk blocking?**

9 A. Trunks are communication lines between two switching systems (central offices).
10 Each trunk carries one conversation, and it may be either a local or long distance
11 call.

12 Blockage occurs when all trunks from one switching system to another are in
13 use. Trunk blockage prevents a caller from reaching the called party.

14

15 **Q. What does the Commission consider to be a service quality complaint?**

16 A. A service quality complaint is a customer complaint related to the Commission's
17 service quality standards. The Commission counts complaints related to quality of
18 service, delayed service and network congestion⁴. In order to fairly compare large
19 and small reporting companies, the commission calculates a percentage based on the
20 number of service quality complaints per 10,000 access lines.

⁴ The following definitions come from the Consumer Affairs Policies and Procedures manual and are used in identifying service quality complaints: Quality of Service – when a customer is complaining of the quality of service and it is related to company's physical plant, facilities, or product, i.e. static; Network Congestion – when the complainant cannot complete outgoing calls (may receive fast busy tone); and Delayed Service – used in telephone complaints where the customer has requested service and the telephone company has delayed installation.

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**V. COMMISSION STAFF’S ANALYSIS OF
SERVICE QUALITY REPORTING REQUIREMENTS**

Q. What companies are required to submit monthly service quality reports?

A. All Class A companies are required to submit monthly service quality reports. WAC 480-120-034 Subsection (2) states, “The classification of a company as Class A or Class B is made without respect to the company’s classification as a competitive company under RCW 80.36.320.” Therefore, any LEC that meets the two percent threshold is designated a Class A company and is required to submit monthly service quality reports.

Currently, the Commission receives monthly service quality reports from three other Class A ILECs - Verizon Northwest, Inc., CenturyTel of Washington and United Telephone Company of the Northwest, d/b/a Embarq.

The Commission also receives monthly service quality reports from two Class A CLECs – AT&T Communications of the Pacific Northwest (AT&T) and MCImetro Access Transmission Services, Inc. (MCImetro).⁵

Exhibit No. ____ C (KMR-4C) is a table that shows the number of access lines and the percentage of lines served for the Class A LECs.

⁵ Previously, the Commission received reports from two other competitive companies - Comcast Phone of Washington, LLC, and XO Communications. Both companies have fallen below the two percent benchmark and are now Class B companies.

1 **Q. Are AT&T and MCImetro the only competitive companies that are required to**
2 **submit monthly service quality reports?**

3 A. No. Two additional competitive companies recently met the two percent access line
4 benchmark and are now required to begin submitting monthly service quality reports
5 – Eschelon Telecom, Inc., and SBC Long Distance, LLC.

6

7 **Q. Do the Class A CLECs submit similar service quality reports as Qwest?**

8 A. No. CLEC networks are different than Qwest's or other ILEC's; therefore, CLECs
9 are unable to collect the same data as ILECs. However, WAC 480-120-439(12)
10 allows companies to petition the Commission for approval of an alternative
11 measurement or reporting format. AT&T, MCImetro and Comcast were granted
12 approval of alternative formats; petitions from Eschelon Telecom, Inc., and SBC
13 Long Distance, LLC, are pending.

14

15 **Q. Why is the fact that the Commission receives service quality reports from**
16 **CLECs significant?**

17 A. Qwest's proposal under the AFOR would have the company not report on service
18 quality, while its Class A competitors are required to do so. Conversely, Staff's
19 recommendation results in Qwest continuing to submit monthly service quality
20 reports, which keeps the company on the same footing as its competitors.

21

1 **Q. Qwest proposes to continue monthly service quality reporting during the four**
2 **year transition period. In Qwest’s direct testimony, company witness Mark S.**
3 **Reynolds claims the company files a monthly 40-page service quality report,**
4 **while other Class A companies file an 8-12 page report. Please comment.**

5 A. Until recently, Qwest filed a longer service quality report than the other Class A
6 ILECs. The 40-page service quality report was an implementation of the merger
7 settlement agreement between US WEST, Inc. and Qwest in Docket UT-991358 that
8 was approved and ordered by the Commission. The settlement agreement contained
9 a Service Quality Performance Program (SQPP). The extensive service quality
10 report was necessary for parties’ ability to evaluate and calculate the annual SQPP
11 customer credits, and was agreed to via a memorandum of understanding (MOU)
12 between Commission Staff, Qwest and Public Counsel.

13 The SQPP program began on January 1, 2001, and the first customer credits
14 were paid in 2002 – based on Qwest’s performance in 2001. Qwest was not
15 obligated to continue the program after December 31, 2005.

16 The 40 pages also included information on Qwest’s CSGP. The Company
17 asked and was permitted to submit this information along with its monthly service
18 quality report.

19
20 **Q. What is the Service Quality Performance Program?**

21 A. The SQPP was a program comprised of eight measurements of performance: 1)
22 Processing of Orders Within 5 Days; 2) Processing of Orders Within 90 Days; 3)
23 Trouble Reports; 4) No Dial Tone; 5) Out-of-Service Conditions – Repair Intervals;

1 6) Answer Time Performance – Repair Calls; 7) Complaint Response; and 8) Answer
2 Time Performance – Customer Service.

3 With regards to the SQPP, Qwest was required to file a monthly report with
4 information sufficient to evaluate the company’s performance on these eight
5 measurements. The reports were to be similar in form and content as existing
6 monthly service quality reports filed by the Company but expanded to include the
7 additional service quality elements. Each month the company fell below the
8 allowable baseline, the company would be required to credit existing customers’
9 accounts. The customer credit amount would be determined at the end of the year,
10 after discussions with Staff and Public Counsel.

11
12 **Q. Does Qwest still need to report the information required by the SQPP?**

13 A. No. Qwest could have submitted a simplified report starting in January of 2006,
14 based on the service quality rules. Since September 2006, Staff has worked with the
15 company to streamline the Company’s monthly service quality report and eliminate
16 information that is redundant and not required on a monthly basis.⁶ Qwest began
17 filing the streamlined report in October, 2006. The number of pages in the report has
18 been cut by approximately 50 percent.

19
20 **Q. What is the Customer Service Guarantee Program (CSGP)?**

21 A. This is a program that is available in Qwest’s tariff that provides customer credits or
22 alternative remedies when service can not be provided as expected. The credits are

⁶ Answer time performance data, switching data, and trunk blocking data reporting are not required as long as the standards are met.

1 given to the customers directly impacted when Qwest does not meet certain
2 obligations.

3

4 **Q. What is the reporting requirement of the CSGP?**

5 A. In its Seventeenth Supplemental Order in Docket UT-991358, the Commission
6 ordered Qwest to provide monthly reports of its performance and credits under
7 CSGP, beginning with the July 2004 report.

8

9 **Q. What does Qwest request in its petition for AFOR regarding the CSGP
10 reporting?**

11 A. Qwest requests relief from the monthly reporting requirement. Staff believes that
12 Qwest is requesting relief of the CSGP reporting requirement entirely, and that this
13 report is not subject to the four-year transition period provision. Qwest asks to be
14 relieved of this requirement because no other carriers are required to report on their
15 respective service guarantee programs.

16 Again, the company's service quality history led to the establishment of this
17 program and eventual reporting requirement. Staff believes that relief of this
18 requirement is not reasonable due to the company's market share in the industry.
19 Currently, Qwest serves 55.2 percent of the total switched access lines in
20 Washington. If this percent falls to a level in which the company is no longer the
21 dominant carrier and is more in line with its competitors, the Commission could
22 evaluate the need for continued reporting of this data. As an alternative, Staff
23 would support receiving information regarding the CSGP on a quarterly basis.

1

2 **Q. Does Qwest’s petition for AFOR specify how the Company will implement the**
3 **CSGP during the AFOR?**

4 A. No. Qwest’s petition is silent and the service is not included in the list of services
5 in Exhibit No. ___ MSR-3. Staff assumes the program will continue to be applied
6 to customers of services that remain under tariff, including those services associated
7 with packages which include a residential line.

8

9 **Q. Does Staff have a recommendation regarding the CSGP?**

10 A. Yes. Staff believes that during the AFOR, Qwest should be required to maintain or
11 improve its performance under the CSGP. Requiring this of Qwest will give a level
12 of assurance that Qwest is fulfilling the quality of service goals contained in the
13 statute.

14

15 **VI. QWEST’S SERVICE QUALITY**

16

17 **Q. Briefly provide history on Qwest’s service quality and reporting requirements.**

18 A. In February 1989, the Commission filed a complaint on its own motion against
19 Qwest’s rates, which at that time was US WEST (USWC). A settlement agreement
20 resolved the complaint and resulted in a rate decrease over five years, and instituted
21 an alternative form of regulation that reduced the company’s regulatory burdens.
22 The AFOR ended December 1994. The termination of the AFOR led to the rate case
23 filing – Docket UT-950200.

1 In the Fifteenth Supplemental Order in Docket UT-950200, the Commission
2 stated, “The Commission finds that USWC is providing service that is substantially
3 worse than that which the Company provided only a few years earlier, at the
4 beginning of its AFOR.”

5 The Commission further noted at footnote 6:

6 It is unfortunate that the Commission’s attempts to reduce the
7 regulatory burdens on USWC appeared to result in the violation of
8 one of the most important conditions for approving an AFOR, that
9 it “[w]ill not result in a degradation of the quality or availability of
10 efficient telecommunications services[.]” RCW 80.36.135(3)(e).
11

12 The Commission also required Qwest to implement a customer service
13 guarantee program in its tariff.

14 As discussed earlier, the SQPP was implemented as a condition of Qwest’s
15 merger with US WEST, effective 2001.

16

17 **Q. Please supply the number of service quality complaints for Qwest throughout**
18 **the life of the SQPP.**

19 A. As mentioned earlier in my testimony, the duration of the SQPP was five years -
20 January 2001 through December 2005. Table 2 shows the number of service quality
21 complaints for Qwest, by type of complaint, and gives the percentage of service
22 quality complaints per total number of complaints.

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Table 2
Service Quality Complaints during the SQPP

Row	Type of Service Quality Complaint	2001	2002	2003	2004	2005
1	Delayed Service	351	170	54	55	26
2	Network Congestion	16	3	1	0	0
3	Quality of Service	283	207	90	85	71
4	Total number of SQ Complaints	650	380	145	140	97
5	Total number of Complaints	1863	1874	895	627	516
6	Percentage of SQ complaints	35%	20%	16%	22%	19%

3

4

As you can see by the table above, the number of service quality complaints dropped each year, during the period of time that the SQPP was in place. The drop from 650 to 97 represents an 85-percent reduction in service quality complaints.

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6

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9

Table 3 represents the current number of service quality complaints. There is a slight increase (11.3 percent) in the number of service quality complaints for 2006⁷, compared to 2005, but the overall number of complaints dropped.

10

11

Table 3
Service Quality Complaints absent the SQPP

Row	Type of Service Quality Complaint	2006
1	Delayed Service	13
2	Network Congestion	0
3	Quality of Service	95
4	Total Number of Service Quality Complaints	108
5	Total Number of Complaints	458
6	Percentage of Service Quality complaints	24%

12

⁷Two significant weather-related force major events occurred in 2006.

1 **Q. What were the dispositions of the service quality complaints for 2004 through**
2 **2006?**

3 A. Table 4 represents the disposition of the service quality complaints for 2004 through
4 2006. The number of quality of service complaints in Table 4 differs from the
5 number in Table 2, due to complaints that were non-jurisdictional or to the lack of
6 findings; for 2006, there is an additional difference due to two complaints that are
7 currently pending (note asterisks in table).

8 Table 4

9 Complaint Dispositions

Row	Year	Type of Complaint	Total Number of Complaints	Number Upheld in Company's Favor	Percent Upheld in Company's Favor	Percent Upheld in Customer's Favor
1	2004	Delayed Service	55	23	42%	58%
2	2004	Quality of Service	83*	41	49%	51%
3	2005	Delayed Service	26	13	50%	50%
4	2005	Quality of Service	67*	32	48%	52%
5	2006	Delayed Service	13	8	62%	38%
6	2006	Quality of Service	89*	54	61%	39%

10
11

12 **Q. Please supply the customer credits that were paid to customers during the**
13 **period of the SQPP.**

14 A. During the life of the SQPP, Qwest paid approximately \$9.1 million in customer
15 credits. Table 5 represents the yearly customer credit payouts – in approximations.

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Table 5
SQPP Customer Credit Payment

Year	Customer Credits
2001	\$3.1 Million
2002	\$1.9 Million
2003	\$1.9 Million
2004	\$1.3 Million
2005	\$920,000
Total	\$9.1 Million

3

4 As Table 5 indicates, from the conception of the program (2001) to the end of
5 the program (2005), the customer credits dropped from \$3.1 million to \$920,000.

6 This represents a 70 percent drop in customer credit payouts. Staff believes this is an
7 indication that during the life of the SQPP, the Company strove to reduce its
8 customer credit payouts by focusing on its service quality.

9

10 **Q. Have you reviewed Qwest's performance on installations and repairs?**

11 A Yes. Staff specifically analyzed the monthly service quality reports for July 2005
12 through October 2006. The Company did meet the five-day standard for
13 installations, for all 16 months that were analyzed, as did all Class A ILECs. Qwest
14 did not meet either the 48-hour or 72-hour repair standard. (Because the rule has a
15 100-percent standard, none of the companies are able to meet these standards.)

16

17 **Q. How does Qwest perform in comparison to the other Class A companies?**

18 A. Exhibit No. ___ C (KMR-5C) is a line graph showing Qwest's performance for
19 various measures under the rule from July 2005 through October 2006. The charts
20 also show the performance of the other Class A LECs.

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VII. CONCLUSIONS

Q. What are Staff’s conclusions regarding Qwest’s service quality?

A. While the Company has not met all Commission service quality standards, the Company’s overall service quality compares favorably to that of other telecommunications companies in this state.

Staff does not dispute that the Company has made vast improvements related to its service quality over the years. However, Staff does not support waiving the service quality reporting rule for the largest provider of telecommunications service in Washington, which has the potential of significantly impacting Washington state customers. In 2003 when Qwest petitioned for early termination of the SQPP, customers were adamantly opposed, indicating that service quality is a major concern to Washington customers.⁸ Staff believes that requiring companies to report not only allows staff the opportunity to monitor service quality performance, but provides more of an incentive for the company to try and achieve the standards if they are held accountable.

In addition, Staff is of the belief, based on previous performance programs, that there appears to be a correlation between financial consequences and service quality improvements.

⁸ Public Counsel’s brief regarding termination of the SQPP at paragraph 27 states, “As reflected in Exhibit 80, the Commission received a large number of comments from the public. All of the 621 comments opposed termination.”

1 **Q. Based on Staff's analysis and conclusion, what is Staff's recommendation for**
2 **Qwest's request for waiver of WAC 480-120-439 and relief from CSGP**
3 **reporting requirements as part of the Company's petition for AFOR?**

4 A. Staff does not oppose granting the Company's modified petition for AFOR.
5 However, because Qwest serves in excess of two percent of the access lines in
6 Washington, competitive treatment would not change Qwest's designation as a Class
7 A company, and the requirement to submit monthly service quality reports.

8 Therefore, regardless of whether Qwest's request for competitive treatment is
9 granted, Qwest's request for waiver of WAC 480-120-439(1) as part of its petition
10 should be denied; and relief of reporting under the Customer Service Guarantee
11 Program should be granted in part.

12

13 **Q. Does this complete your testimony?**

14 A. Yes.

15