

EXHIBIT 15

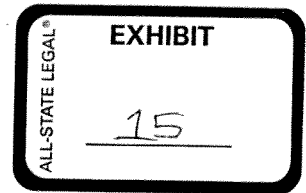
SEP 27 2000

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of Request for Petition of
Waiver of Administrative Rules for

Qwest Corporation (formerly,
U S WEST Communications, Inc.)

)
) DOCKET UT-990043
)
) ORDER GRANTING FULL AND
) PARTIAL TEMPORARY WAIVER OF
) WAC 480-120-141(2)(b)
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On January 12, 1999, U S WEST Communications, Inc., (now, Qwest Corporation) filed a petition for a waiver of WAC 480-120-141(2)(b) governing operator services. U S WEST explained in its petition that it sought the waiver of certain parts of the rule because the technology was not available at that time to comply with the revised rule requirements. In particular, the company sought an extension for compliance with WAC 480-120-141(2)(b) for 15 months after the date of an FCC order on this very same issue to develop the technology to provide automatic verbal rate quotes from operator service providers serving pay phones.

On September 20, 2000, Qwest filed an amendment that states the company can comply, in general, with the above rule section by September 30, 2000, and seeks a waiver until that time. The company also asks for consideration as it relates specifically to services from pay phones in correctional facilities. Qwest/U S WEST is working to implement technology that restricts inmate access to live operators, yet makes rate information available to the party who receives the collect call from an inmate.

Qwest/U S WEST further seeks a temporary waiver of this rule until December 1, 2000, with regard to verbal disclosure to persons receiving collect calls from inmate pay phones in order to deploy the technology at the facilities throughout the state.

DISCUSSION

Verbal Disclosure of Rates - General

The Commission made significant changes to its pay phone and operator services rules in January 1999 to carry out consumer protections regarding pay phone use after deregulation of much of the pay phone industry at the federal level. The Commission's rules were revised in order to be consistent with the Telecommunications Act of 1996 and subsequent FCC orders relating to pay phones and operator services, and to ensure adequate protections for users of pay phones within Washington state. One of the major additions to the FCC's rules and subsequently the Commission's rules is the capability for a consumer to receive a verbal rate quote from the pay phone within no more than two key strokes.

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Qwest/U S WEST now indicates that it can comply with the verbal rate disclosure by September 30, 2000. The Commission finds that Qwest/U S WEST's operator-assisted rates have not been a source of complaints for this Commission, have not harmed the public, and therefore recommends granting a waiver, temporarily, of the verbal advice requirement of WAC 480-120-141(2)(b) until September 30, 2000. Qwest must provide a rate quote if requested by a caller. The rate quoted for the call must include any applicable surcharge. Charges to the user must not exceed the quoted rate. After September 30, 2000, Commission Staff will conduct an investigation into the practices of Qwest/U S WEST's operator services, and if Qwest/U S WEST is not able to offer verbal disclosures in compliance with the rule, it will be subject to penalties.

Verbal Disclosure of Rates - Prison Phones

This Commission's rules define a consumer as the party initiating and or paying for a call using operator services. In collect calls, both the originating and the receiving party of the call are considered consumers. Qwest/U S WEST's automated technology will prompt the called party to ask for a rate quote. Qwest/U S WEST seeks a temporary waiver of WAC 480-120-141(2)(b) until December 1, 2000, as it applies to the receiver of the collect call, when that call originates from an inmate phone at a correctional facility. The waiver is necessary in order for the Company to deploy the technology in the correctional facilities throughout the state. Qwest/U S WEST has escalated this issue to its provider for installation sooner than the end of the year, and may improve upon this commitment.

The Commission finds that this is a sound request since the Company's operator-assisted rates compare favorably to other carrier's rates that serve inmate phones. With the condition of providing the Commission with a monthly report outlining specific action steps taken to ensure implementation of this technology by year end, the Commission will grant the waiver, temporarily, of WAC 480-120-141(2)(b) until December 1, 2000 only as it applies to the receiver of the collect call. Once the technology is in place by year-end, Qwest/U S WEST must always make available to the receiver of the collect call automatic access to a rate quote as required by the rule.

FINDINGS

THE COMMISSION FINDS:

1. Qwest, a Washington corporation, is a public service company subject to the jurisdiction of this Commission under the provisions of chapter 80.28 RCW.
2. Qwest can comply with the verbal rate disclosure by September 30, 2000. Granting the waiver until September 30, 2000, of the requirement, within WAC 480-120-141(2)(b), to verbally advise consumers how to receive a rate quote on an operator-assisted call is reasonable

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and should therefore be approved. Qwest must provide a rate quote if requested by a caller. The rate quoted for the call must include any applicable surcharge. Charges to the user must not exceed the quoted rate.

3. Qwest must make the verbal disclosure option available to the person receiving the call (i.e., the recipient of a collect call from an inmate) who ultimately will incur the cost of the call. The Commission grants the temporary waiver of WAC 480-120-141(2)(b) as it applies to the receiver of the collect call from a correctional facility until December 1, 2000. The company shall provide the Commission Staff with a monthly report outlining specific action steps taken to ensure statewide implementation of this technology by year end.


ORDER

1. The Commission grants Qwest's request for a waiver until September 30, 2000, of the requirement, within WAC 480-120-141(2)(b), to verbally advise consumers how to receive a rate quote on an operator-assisted call. Qwest must provide a rate quote if requested by a caller. The rate quoted for the call must include any applicable surcharge. Charges to the user must not exceed the quoted rate. Staff is directed to conduct an investigation into the practices of Qwest/U S WEST's operator services after September 30, 2000.

2. The Commission grants Qwest's request for a temporary waiver until December 1, 2000, of WAC 480-120-141(2)(b), only as it applies to the receiving party of collect calls from inmates at correctional facilities to deploy the technology necessary to enable the receiver of a collect call to have access to an automated rate quote. The company must provide the Commission Staff with a monthly report outlining specific action steps taken to ensure statewide implementation of this technology by year end.

DATED at Olympia, Washington, and effective this 27th day of September, 2000.

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION


RICHARD HEMSTAD, Commissioner


WILLIAM R. GILLIS, Commissioner

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DISSENTING OPINION

MARILYN SHOWALTER, Chairwoman, dissenting -- I dissent. These rules have been in effect since January 29, 1999. No evidence has been presented why the company could not have complied with the rules by now. While I appreciate the company's willingness to comply with the rules within the next 3 (or 60) days, I do not think this is a persuasive reason why the rules should be waived for that period of time.



MARILYN SHOWALTER, Chairwoman