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IDAHO PUBLIC
UTILITIES COMMISSION

July 23, 2013

Jean Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83720

RE: Comments in Support of CenturyLink's Request for Partial Waiver of the Requirements of IPUC Order No. 29841 – Case Nos. QWE-T-13-03, CEN-T-13-03, CGS-T-13-03

Dear Ms Jewell,

Please find enclosed the original and seven copies of comments on behalf of Frontier Communications Northwest Inc. and Citizens Telecommunications Company of Oregon (collectively, "Frontier Communications") in support of the above mentioned CenturyLink petition.

Sincerely,

Renee Willer
Regulatory Manager
Frontier Communications Northwest Inc.
20575 NW Von Neumann Drive
Beaverton, OR 97006
503.645.7909
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Enclosures

cc: Service List

BEFORE THE
IDAHO PUBLIC UTILITIES COMMISSION

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IN THE MATTER OF THE REQUEST FOR)
PARTIAL WAIVER OF THE) QWE-T-13-03
REQUIREMENTS OF IPUC ORDER) CEN-T-13-03
NO. 29841) CGS-T-13-03
)
) COMMENTS OF
) FRONTIER COMMUNICATONS

Frontier Communications submits the following comments in response to the Notice of Application and Notice of Modified Procedure in Case Nos. QWE-T-13-03, CEN-T-13-03 and CGS-T-13-03 issued by the Commission on July 3, 2013. Frontier Communications Northwest Inc. and Citizen's Telecommunications Company of Idaho (Collectively Frontier Communications) are designated Eligible Telecommunications Carriers ("ETC") in Idaho and are interested in the outcome of this proceeding.

On June 7, 2013 the collective CenturyLink Companies filed a Petition for Partial Waiver of the ETC reporting requirements set forth in IPUC Order 20841, specifically the requirement to file a two-year network improvement plan. The Commission subsequently issued Order No. 32844, Notice of Application and Notice of Modified Procedure and invited comments from interested parties as to whether or not the waiver request, if approved, should apply to all ETCs in addition to the Petitioner CenturyLink.

In its Petition, CenturyLink noted that the FCC issued an order waiving the five-year plan requirement for 2013, noting that the agency has not completed all the steps necessary to provide a final form for use by ETCs and is still in the process of formulating their new reporting requirements. In light of this action, it does not make prudent sense to prepare and submit a two-year network improvement plan for Idaho that is not in conformance with the 2013 FCC requirements.

Frontier Communications supports the Petition for Partial Waiver submitted by the CenturyLink companies and requests that the Commission grant the Partial Waiver and have it apply to all Idaho Eligible Telecommunications Carriers in the state of Idaho.