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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE JOINT )**  
**PETITION OF QWEST CORPORATION DBA )** **CASE NOS. QWE-T-13-03**  
**CENTURYLINK QC, CENTURYTEL OF )** **CEN-T-13-03**  
**IDAHO, INC. DBA CENTURYLINK AND )** **CGS-T-13-03**  
**CENTURYTEL OF THE GEM STATE, INC. DBA )**  
**CENTURYLINK FOR PARTIAL WAIVER OF )** **COMMENTS OF THE**  
**THE REQUIREMENTS OF IPUC ORDER NO. )** **COMMISSION STAFF**  
**20841. )**

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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, and in response to the Notice of Application and Notice of Modified Procedure issued in Order No. 32844 on July 3, 2013, submits the following comments.

**BACKGROUND**

On June 7, 2013, the Commission received a Joint Petition from Qwest Corporation dba CenturyLink QC; CenturyTel of Idaho, Inc. dba CenturyLink; and CenturyTel of the Gem State, Inc. dba CenturyLink (collectively "CenturyLink") for Partial Waiver of the requirements of Commission Order No. 29841. Specifically, CenturyLink requests a waiver of the requirement that it file a two-year network improvement plan in connection with the annual eligible telecommunications carrier ("ETC") recertification report due to the Commission on September