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IDAHO PUBLIC
UTILITIES COMMISSIO..

June 20, 2008

Mrs. Jean Jewell
Idaho Public Utilities Commission
472 West Washington Street
Boise, ID 83702

CTC T-08-02

RE: The Petition of Citizens Telecommunications of Idaho for a partial exemption from Rule 31.41.01.201(02).

Mrs. Jewell,

Please find enclosed the original and 8 copies of the Petition of Citizens Telecommunications of Idaho, dba, Frontier Communications of Idaho for a partial waiver from Rule 31.41.01.201(02).

If you have any questions, please contact me.

Sincerely,



Ingo Henningsen
Manager, Government and External Affairs

BEFORE THE IDAHO PUBLIC SERVICE COMMISSION

**PETITION OF CITIZENS)
TELECOMMUNICATIONS OF IDAHO FOR) CASE NO.
A PARTIAL EXEMPTION FROM RULE)
31.41.01.201(02))**

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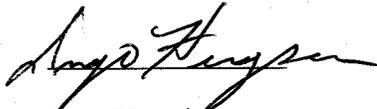
PETITION FOR EXEMPTION

Citizens Telecommunications of Idaho, dba, Frontier Communications of Idaho (Frontier) hereby submits a petition for partial exemption from Rule 31.41.01.201(02).

- 1) Pursuant to IDAPA 31.41.01.009 Frontier requests a permanent exemption from rule 31.41.01.201(02) (Rule 201.02) to the extent that long distance billing detail is required for customers that do not pay for toll calls on a per call basis but instead pay a flat rate for unlimited Long distance calling.
- 2) Rule 201.02 requires that "bills for MTS service must itemize for all MTS calls the number called and the date, time, duration, destination and charge for each call".
- 3) Frontier offers customers service options that include unlimited long distance charges at a flat rate. Customers who choose these options are not charged separately for each call, but rather pay a single monthly charge for unlimited long distance just as they do for local service. Frontier wishes to discontinue providing the required long distance detail in the bills of customers who subscribe to flat rate long distance service only. Customers who do not subscribe to a flat rated toll plan and pay long distance charges based on time and distance of individual calls will continue to receive details of each long distance call being billed.
- 4) Providing individual details of each call adds significant printing and postage charges to the preparation and distribution of customer bills. In addition, the bills are often significantly more cumbersome and provide information that most customers do not need or want.
- 5) Frontier customers who wish to receive call detail for their unlimited plan may do so by requesting the information from Frontier's customer service centers.
- 6) In its order No. 30555 in Case No.QWE-T-08-02, the Commission granted Qwest's application for exemption from certain provisions of rule 201, including rule 201.02, with the condition that customers have "access to a minimum of 12 consecutive monthly billing statements at no charge". Frontier will maintain records of call detail of at least 12 months and make that information available to customers upon request at no charge.

- 7) Under rule No. IDAPA 31.4.1.01.009 (rule 9) "If unusual or unreasonable hardships result from the application of any of these rules, any telephone company or customer may apply to the Commission for, or the Commission on its own motion may order, a permanent or temporary exemption." Frontier believes that this request meets that standard.
- 8) Without the requested exemption, Frontier and its customers will be required to bear the unnecessary expense of preparing and mailing additional information that is not necessary for customers to determine the accuracy of their bills and will still be available on line or upon customer request.
- 9) Granting this petition will allow Frontier and its customers to avoid unnecessary bills and will simplify bills received by customers while still making all of the data required by rule 201.02 available to customers upon request. Denying the petition will result in a hardship on Frontier, which is attempting to improve customer service by reducing costs without the loss of any data that customers may require.
- 10) Frontier therefore, respectfully requests that the Commission consider this petition and expeditiously grant the relief requested.

Submitted this 20th day of June, 2008



Ingo Henningsen

Manager, Government and External Affairs

Frontier Communications

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