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UTILITIES COMMISSION

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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**APPLICATION FOR AMENDMENT
OF CERTIFICATE OF PUBLIC
CONVENIENCE AND NECESSITY OF
QWEST COMMUNICATIONS
CORPORATION**

CASE NO. QCC-T-04-1

**RESPONSES OF QCC TO FIRST
PRODUCTION REQUEST OF THE
COMMISSION STAFF**

Qwest Communications Corporation (QCC), by and through its undersigned attorneys,
files the attached Responses to the First Production Request of the Commission Staff.

Dated this 29th day of April, 2004.



Mary S. Hobson
Stoel Rives, LLP

Adam L. Sherr
Qwest

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2004, I served the foregoing **RESPONSES OF QCC TO FIRST PRODUCTION REQUEST OF THE COMMISSION STAFF** upon all parties of record in this matter as follows:

Ms. Jean Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington Street
Boise, Idaho 83720-0074

Hand Delivery
 U. S. Mail
 Overnight Delivery
 Facsimile

Weldon B. Stutzman
Deputy Attorney General
Idaho Public Utilities Commission
P.O. Box 83720
Boise, ID 83720-0074

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 Facsimile



Laurie Rehder
Legal Secretary to Mary S. Hobson
Stoel Rives LLP

Idaho
Case No. QCC-T-04-1
STF 01-001

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 001

What is the intended market of Qwest Communications Corporation (QCC).
What products does QCC intend to sell to which types of customers?

a. Does QCC intend to enter the residential basic local exchange service (POTS) market?

b. Does QCC intend to enter the small business POTS market?

RESPONSE:

Geographic market for QCC: State of Idaho

Product market for QCC: QCC currently provides inter-exchange data and voice services to Idaho customers. At present it intends to offer additional services, including packaged product offers, using resold PRI, business local exchange service and local T-1 spans to large business and government customers.

QCC has no plans at this time to enter the residential basic local exchange service (POTS) market or the small business (5 lines or fewer) POTS market.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-002

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 002

QCC is already certified to provide local exchange service in Verizon's service area in Idaho. Please describe the types of services currently being provided in Idaho by QCC. How many local exchange customers does QCC have Verizon's service area.

RESPONSE:

QCC is not currently providing local exchange services in Verizon territory in Idaho. However, QCC is providing interexchange services to customers in Idaho as described in detail in its Catalog. QCC is also providing data services in Idaho, including in the Verizon ILEC service area.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-003

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 003

Does QCC intend to construct or own any facilities?

RESPONSE:

QCC currently has significant transport, private line, and switching/router facilities in Idaho, used in connection with its existing inter-exchange carrier and data service operations. With regard to the provision of local exchange services, QCC will likely rely on the purchase of wholesale and retail services and facilities that will be used in combination with its own facilities where appropriate.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-004

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 004

QCC and Qwest Corporation (QC) are currently subject to the federal separate affiliate requirements of Section 272. Qwest may seek to eliminate some separation requirements 3 years after Qwest obtained 271 authority. What is the intent of Qwest in regards to maintaining such separation at the end of the mandatory period? Will both QCC and QC continue to operate.

RESPONSE:

QCC and QC have not finalized any plans with regard to the possible elimination of separation requirements at the end of the mandatory period.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-005

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 005

What is the extent of joint marketing expected between QC and QCC? Will QCC use QC customer service representatives (CSRs)? If so, how will branding be provided for QCC? How will branding be provided for QC? What provisions will be made to ensure that the CSRs are discussing the correct company policies, terms and conditions?

RESPONSE:

QC and QCC currently jointly market services within the legal framework created by Section 272 of the Telecommunications Act of 1996. Qwest intends to continue to do so, consistent with Section 272 and QCC's expanded authority.

As discussed in response to Production Request No. STF 01-001, QCC anticipates serving large business and government customers in Idaho as a CLEC. Those types of customers do not typically obtain service by telephoning into a centralized call center, but instead are served by large business account teams which sell services provided by various entities within the Qwest family of companies. Qwest anticipates that QCC large business local exchange customers will be served by the same large business account teams as currently assist QC large business customers.

Currently, it is anticipated that both QCC and QC will continue to use the Qwest brand. As required, Qwest's various ordering and billing systems, and their associated methods and procedures, will be developed and maintained in such a manner as to insure accurate information is provided to all customers.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-006

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 006

How will customers be made aware of the different "Qwest's"? Will they have different 800 numbers? If a potential new customer calls "Qwest" to sign up for basic local exchange service, will they initially be offered such service from Qwest the ILEC or Qwest the CLEC? If the rates or terms are different, how will this be made clear to the customer? Will the bonuses or commissions paid to sales personnel be greater or different for QCC than QC?

RESPONSE:

New residence and small business customers requesting basic local exchange service from Qwest will be provided services by QC, where available; QCC does not presently plan to provide such services. QCC has generally described the products it initially plans to offer in its application. Subject to the continuously evolving nature of business plans, Qwest states that it has not developed detailed Idaho-specific business plans for QCC CLEC operations. Hence, QCC cannot respond in more detail to that portion of the request seeking information about rates for services offered by QCC or sales incentives for QCC products.

Presently, questions regarding customer billing and customer service matters are addressed as follows:

Business customers:

If Qwest Corporation is your local provider: (800) 630-6000

If Qwest Corporation is not your local provider: (800) 860-1020

Residential customers:

If Qwest Corporation is your local provider: (800) 244-1111

If Qwest Corporation is not your local provider: (800) 860-2255

Primary interexchange carrier ("PIC") disputes: (800) 244-1111

Respondent: John McCormick

Idaho
Case No. QCC-T-04-1
STF 01-007

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 007

Can an individual be a customer of QC for some products and a customer of QCC for other products? (Same location). If so, please describe.

RESPONSE:

Yes. Individuals may be, and many currently are, customers of QC local exchange-related products and of QCC interexchange products. Also, an individual or business could be a customer purchasing QC local voice or data products and also QCC data products.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-008

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 008

In its Application, QCC indicated it had obtained certificates to provide local exchange services in a number of other states in which QC is the ILEC. What is the scope of QCC operations in those states? How many customers for what types of services? Please provide the terms under which any joint marketing may be conducted between QCC and QC in those states?

RESPONSE:

QCC is not yet providing local exchange telecommunications services in any in-region state, although it is authorized to do so in all or parts of WA, OR, ID, UT, IA, MT, CO, WY and MN. QCC is providing interexchange and information services in all 14 in-region states. With regard to joint marketing, see QCC's response to Production Request No. 5.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-009

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 009

Has QCC signed any interconnection agreements with QC in any other states.
Of so, please identify? With Verizon or other ILECs?

RESPONSE:

No. QCC requested to opt into the 14 QC SGATs. QCC understands that QC is preparing the contracts for QCC review and execution. QCC and QC have not yet signed any interconnection agreements. As the agreements are completed, QC will file these with the regulatory commission in each state. With regard to other ILECs, see Attachment A.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-010

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 010

Will the line splitting policies of QCC be the same as those of QC? If not, please describe.

RESPONSE:

No. QCC has no line splitting obligations under the Act.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-011

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 011

Please explain how the presence of a Qwest Corporation affiliate as a competitor to Qwest's own services is in the public interest

RESPONSE:

QC's and QCC's operations will serve the public interest by allowing Qwest to operate through a single entity where customers' needs demand complex telecommunications solutions. Many business customers require multiple complex services that are networked or managed as a single set of shared services for their businesses. In such businesses central budgeting, service management and service activation drive decision makers to seek a single entity to service its needs on a state-wide, regional, or national basis.

In many states Qwest has been unable to respond competitively to statewide, regional, or national bids due to its lack of a geographically independent product set and inability to offer a complete product set through a single entity. QC (the ILEC) has limitations in its ability to serve multiple LATAs and QCC (the CLEC) is not certified to operate and/or does not have the interconnection contracts with ILECs necessary to provide the local components to be responsive to a typical Request For Proposal (RFP). Qwest has difficulty competing with CLECs, CLEC/IXC combinations, and ILEC consortiums that are able to respond in such a manner.

To be at full parity with competitors Qwest requires certification as a CLEC. Qwest desires to fully develop its functionality so that it may lead and react to competitive opportunities. As changes in technology, regulation, and customer needs occur, Qwest needs to be positioned to competitively respond to and serve customers.

Adding Qwest to the competitive marketplace to provide innovative solutions for local and interexchange telecommunications services benefits consumers and serves the public interest by stimulating competition in the market for telecommunications, which generally results in better service, lower prices, greater availability, and improved innovation.

Respondent: John R. McCormick, Qwest Manager

Idaho
Case No. QCC-T-04-1
STF 01-012

INTERVENOR: Staff of the Idaho Public Utilities Commission

REQUEST NO: 012

What title 62 services, other than long distance services, is QCC currently providing in QC's certificated territory?

RESPONSE:

See QCC's responses to Production Request Nos. 2 and 8.

Respondent: John R. McCormick, Qwest Manager

RBOC	STATE
PacBell	CA
SWBT	TX
Ameritech	WI
Ameritech	IN
Ameritech	OH
Ameritech	IL
Ameritech	MI
Bell Atlantic	PA
Bell Atlantic	NJ
Bell Atlantic	NY
Bell Atlantic	VA
Bell Atlantic	DC
Bell Atlantic	MD
Bell Atlantic	DE
Bell Atlantic	MA
SWBT	KS
SWBT	MO
SWBT	AR
SWBT	OK
CBT^	OH
GTE^	CA
GTE^	FL
GTE^	TX
GTE^	VA
Sprint^	MO
BellSouth	FL
BellSouth	GA
BellSouth	KY
BellSouth	NC
BellSouth	TN