

WELDON B. STUTZMAN
DEPUTY ATTORNEY GENERAL
IDAHO PUBLIC UTILITIES COMMISSION
PO BOX 83720
BOISE, IDAHO 83720-0074
(208) 334-0318
ISB NO. 3283

RECEIVED
FILED
2003 FEB 12 PM 2:20
IDAHO PUBLIC UTILITIES COMMISSION

Street Address for Express Mail:
472 W. WASHINGTON
BOISE, IDAHO 83702-5983

Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

**IN THE MATTER OF THE APPLICATION OF)
QWEST CORPORATION FOR) CASE NO. QWE-T-02-25
DEREGULATION OF BASIC LOCAL)
EXCHANGE RATES IN ITS BOISE, NAMPA,) THIRD PRODUCTION
CALDWELL, MERIDIAN, TWIN FALLS,) REQUEST OF THE
IDAHO FALLS, AND POCATELLO) COMMISSION STAFF TO
EXCHANGES.) QWEST CORPORATION
_____)**

The Staff of the Idaho Public Utilities Commission by and through its attorney of record, Weldon B. Stutzman, Deputy Attorney General, requests Qwest Corporation (Qwest) provide the following documents and information, pursuant to Commission Rule of Procedure 225, IDAPA 31.01.01.225, **on or before February 28, 2003.**

This Production Request is to be considered as continuing, and Qwest is requested to provide, by way of supplementary responses, additional documents and information that it or any person acting on its behalf may later obtain that will augment the documents and information produced. For each request, please state the name of the person(s) preparing the answers, along with the job title of such person(s) and the witness who can sponsor the answer at hearing. If responses include workpapers or spreadsheets, please provide the responses on computer media (3.5" diskette or CD) using Lotus 123 (4.0) or Excel 5.0 language.

DEFINITIONS and INSTRUCTIONS

- A. The words “the Company” and “Qwest” refer to Qwest Corporation
2. “Document” includes any written or recorded or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, microfiche, pictures, data processing cards or discs, computer tapes and other computer-generated and stored information or data base, work papers, calendars, minutes of meetings or any other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession.
- (1) In the event that any document called for is to be withheld on the basis of a claim of privilege, identify the item being withheld as follows: addressor; addressee; indicated or blind copies; and all persons to whom distributed, shown, or explained. Also identify the nature and legal basis of the privilege asserted.
- (2) In the event that any document called for by this request has been destroyed or transferred beyond the control of the Company, (a) state the identity of the person by whom it was destroyed and person authorizing destruction and the time, place, and method of, and reasons for its destruction, and if destroyed or disposed of by operation of a retention policy, state the retention policy; and, if transferred, the person authorizing transfer and the time, place, and method of, and reason for, its transfer, and (b) identify it as follows: addressor; addressee; indicated or blind copies; dates; subject matter; number of pages, attachments or appendices; and all persons to whom distributed, shown, or explained.
- C. “Identify,” “Identity,” or “Identification,” when used in reference to an individual person, means to state that person's full name and residence address, including zip code and phone number, if known, and present or last known business position and duties and business address, if known.
- D. “Identify,” “Identity,” or “Identification,” when used in reference to a document, means to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but is no longer, in your possession or subject to your control, state what disposition was made of it, and if destroyed or disposed of by operation of a retention policy, state the retention policy.
- E. “Identify,” “Identity,” or “Identification,” when used in reference to a number or other specific information, means to identify the document containing this information or some other means of identifying it, and to specify the approximate location of the requested information within that document.

F. "Identify," "Identity," or "Identification," when used in reference to a business organization, means to state the corporate name or other names under which said organization does business, and location of its principal place of business.

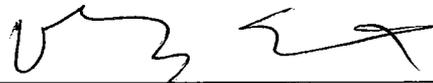
Note: to the extent the specific information requested herein is not available, but analogous or reasonably comparable information is available, please provide that information instead, and explain any differences between what was requested and what has been provided. To the extent the information requested herein is not available in the exact format requested, but the information can be more easily provided in a different format, please provide your response in the more readily available format, but explain any differences in format. Please provide an electronic copy of the requested information in Excel spreadsheet or compatible format.

Interrogatory No. 13: Please identify any promotions or special offers that the Company has conducted for either primary lines, additional lines, or packages involving primary or additional lines, between January 1, 1999 and December 31, 2002. Please identify the timeframe of the promotion, as well as the applicable rates, terms and conditions of the promotion.

Interrogatory No. 14: Please identify any promotions or special offers that the Company has conducted for custom calling features or caller identification services, either individually or in packages or combinations, between January 1, 1999 and December 31, 2002. Please identify the timeframe of the promotion, as well as the applicable rates, terms and conditions of the promotion.

Interrogatory No. 15: Please provide the latest available data for subscriber line usage that would identify the average number of local minutes (both originating and terminating) used by Qwest subscribers. Please provide such data for weekdays and weekend days, and for peak and off peak periods.

DATED at Boise, Idaho, this 12th day of February 2003.



Weldon B. Stutzman
Deputy Attorney General

Technical Staff: Joe Cusick
Wayne Hart

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 12TH DAY OF FEBRUARY 2003, SERVED THE FOREGOING **THIRD PRODUCTION REQUEST OF THE COMMISSION STAFF TO QWEST CORPORATION**, IN CASE NO. QWE-T-02-25, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

MARY S HOBSON
STOEL RIVES LLP
SUITE 1900
101 S CAPITOL BLVD
BOISE ID 83702

ADAM L SHERR
QWEST
1600 7TH AVE, ROOM 3206
SEATTLE WA 98191

CONLEY WARD
GIVENS PURSLEY LLP
277 N 6TH ST, SUITE 200
PO BOX 2720
BOISE ID 83701-2720

CLAY R STURGIS
MOSS ADAMS LLP
601 W RIVERSIDE, SUITE 1800
SPOKANE WA 99201-0663

DEAN J MILLER
McDEVITT & MILLER LLP
420 W BANNOCK ST
PO BOX 2565 (83701)
BOISE ID 83702

BRIAN THOMAS
TIME WARNER TELECOM
223 TAYLOR AVE NORTH
SEATTLE WA 98109

SUSAN TRAVIS
WORLD.COM INC
707 17TH STREET, SUITE 4200
DENVER CO 80202

MARY JANE RASHER
AT&T COMMUNICATIONS OF THE
MOUNTAIN STATES INC
10005 S GWENDELYN LANE
HIGHLANDS RANCH, CO 80129-6217

MARLIN D ARD
WILLARD L FORSYTH
HERSHNER, HUNTER, ANDREWS, NEILL
& SMITH, LLP
180 E 11TH AVE
PO BOX 1475
EUGENE OR 97440-1475

DEAN RANDALL
VERIZON NORTHWEST INC
17933 NW EVERGREEN PKWY
BEAVERTON OR 97006-7438

JOHN GANNON
ATTORNEY AT LAW
1101 W RIVER, SUITE 110
BOISE ID 83702

BEN JOHNSON ASSOCIATES INC
2252 KILLEARN CENTER BLVD
TALLAHASSEE FL 32308


SECRETARY