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February 14, 2003  
*via Hand Delivery*

Ms. Jean Jewell  
Idaho Public Utilities Commission  
472 West Washington  
Post Office Box 83720  
Boise, Idaho 83720-0074

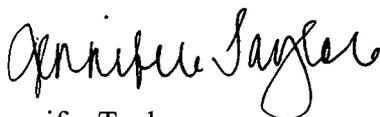
**Re: Case No. QWE-T-03-4**  
MTBR&F File No. 15-881

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 IDAHO PUBLIC UTILITIES COMMISSION

Dear Ms. Jewell:

Enclosed for filing in the above-referenced case are the original and seven copies of Citizens dba Frontier's Response Comments. Thank you for your assistance.

Very truly yours,



Jennifer Taylor  
Administrative Assistant to  
Morgan W. Richards, Jr.

/jrt  
Enclosures

Morgan W. Richards, ISB No. 1913  
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Attorneys for Citizens Telecommunications  
Company of Idaho dba Frontier Communications

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF QWEST'S PROPOSAL  
TO USE REVENUE SHARING FUNDS TO  
MAKE NETWORK IMPROVEMENTS IN ITS  
SOUTHERN IDAHO SERVICE AREA.

Case No. QWE-T-03-4

**RESPONSE COMMENTS**

COMES NOW Citizens Telecommunications Company of Idaho doing business as Frontier Communications ("Frontier") and files these comments in response to the proposed filing by Qwest Corporation ("Qwest") to use revenue sharing funds to make network improvements in its southern Idaho service area. A Notice of Modified Procedure was issued by the Idaho Public Utilities Commission ("Commission") and these comments are filed pursuant to that notice.

Qwest proposes to use \$4 million in revenue sharing funds, plus \$4 million of its own funds, to make improvements in the following system components: 1) replacement of lead sheath cabling in the local exchange network and selected wire centers; 2) replacement or rehabilitation of air core cabling in the local exchange network in selected wire centers;

3) replacement of control points/access points (i.e., terminal boxes or enclosures) in selected wire centers; and 4) replacement of Anaconda analog carrier systems across Idaho.

Frontier believes the proposal made by Qwest is an inappropriate use of revenue sharing funds. The proposal is comprised of projects most, if not all, other companies in Idaho have completed without the benefit of special funding . As an alternative, Frontier proposes the fund be used to build a north - south fiber route.

In Case No. GNR-T-00-40, the Commission approved the construction of a fiber optic route between Riggins and Grangeville using funds made available from the sale of exchanges approved in Case No. USW-T-99-25/CTC-T-99-2. Subsequent to the Commission's approval, the sale of exchange transaction between Frontier and Qwest was cancelled. One of the consequences of the cancelled transaction between the two companies was the elimination of the proposed funding source for the fiber route. Although the funding source was eliminated, the need for the fiber route was not.

The Commission's conclusions discussed in Case No. GNR-T-00-40 regarding the need for a communications infrastructure connecting southern and northern Idaho are just as valid today as they were in April of 2001. The record reflects almost unanimous support for the project, including dozens of written comments from the public extolling the benefits of the proposed facility.

Long-term benefits of a direct fiber connection between Southern and Northern Idaho will be shared by customers on both sides of the present gap. As Staff noted in its report to the Commission, "[C]onstruction of this route will close the longest and costliest gap in a future continuous fiber route connecting the southern and northern part of our state." Immediate benefits from the construction of this project include a continuous fiber route from Lewiston to

Horseshoe Bend providing increased capacity and reliability; improved emergency services for Riggins and Whitebird; and, provisioning of the long standing request for extended area service from Riggins and Whitebird to Grangeville.

The Commission has already decided there is a need for the fiber route and that the local exchange companies serving the exchanges on both sides of the gap are in the best position to construct and operate the new facility. If funding is approved as outlined herein, Frontier is prepared to perform the construction from Riggins all the way to the Grangeville central office, if necessary. In addition, Frontier is willing to accept all applicable provisions of Order No. 28690, including the preparation of detailed cost estimates, reporting of actual costs, regulatory accounting, and access by competitor telecommunication providers on a non-discriminatory, competitively neutral basis.

The Commission had the foresight to recognize the necessity of the fiber route two years ago. The necessity still exists today. Rather than appropriating revenue sharing funds for basic maintenance and network improvements that should rightfully be funded 100% by Qwest in the normal course of business, these revenue sharing funds could be better utilized for the construction of a north - south fiber route. The existing facility gap between the North and South is not likely to be bridged without special funding.

Respectfully submitted this 14<sup>th</sup> day of February, 2003.

MOFFATT, THOMAS, BARRETT, ROCK &  
FIELDS, CHARTERED

By Morgan W. Richards  
Morgan W. Richards - Of the Firm  
Attorneys for Citizens Telecommunications  
Company of Idaho dba Frontier Communications

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 14<sup>th</sup> day of February, 2003, I caused a true and correct copy of the foregoing **RESPONSE COMMENTS** to be served by the method indicated below, and addressed to the following:

Commission Secretary  
IDAHO PUBLIC UTILITIES COMMISSION  
472 West Washington Street  
Post Office Box 83720  
Boise, Idaho 83720-0074

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John Souba  
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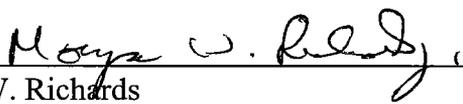
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Morgan W. Richards