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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF QWEST  
CORPORATION'S PROPOSAL TO PHASE  
OUT BOISE AND POCATELLO CUSTOMER  
PAYMENT CENTERS**

**Case. No. QWE-T-03-10  
REPLY COMMENTS OF QWEST  
CORPORATION**

Qwest Corporation files the following comments in reply to the Comments of the Commission Staff filed May 16, 2003.

**COMMENTS**

Qwest appreciates the time and effort Staff has put into evaluating Qwest's application and notes that Staff's overall support of Qwest's position demonstrates that it is appropriate that the Commission decide the case on record presented and without the detailed data collection that had been required several years ago. Staff's review supports Qwest's position that new options for payment of customer bills coupled with the extensive network of pay agents adequately meet customers' needs without maintaining the Qwest-operated Customer Payment Centers (CPCs).

There are, however, a handful of Staff recommendations on which Qwest would like to further comment.

1. **Drop Boxes**

Staff recommends that “drop boxes be kept at the current locations for at least one year after closure of the CPC to help customers with the transition of the CPC closure.” Qwest believes that this suggestion is not closely connected with transitioning the CPCs and could be counter-productive. The drop boxes are simply that, i.e., boxes in which customers can place their payments and avoid the cost of postage. Customers do not receive personalized service, they do not have their payments immediately posted to their accounts and they do not receive receipts. The customer concerns that have prompted the most discussion in this case: ability to interact with a live person, help for the elderly or handicapped, and assurance that delinquent payments are posted in order to avoid disconnection are not answered by leaving the drop boxes in place and should be addressed by insuring that customers are aware of their option to use payment agents.

Furthermore, to the extent that customers believe there is some benefit to placing payments in the drop boxes, leaving them in place could create, rather than solve, customer problems. Staff states, “if the payments received in the drop box will not be processed immediately, a sign should be posted alerting customers of the timeframe involved for payments to post as well as the availability of other payment options, including the location of the nearest payment agent.” Qwest believes that posting detailed information at the drop box locations is not feasible due to exposure to weather and potential vandalism. Furthermore the suggestion demonstrates that customers would be better off if the drop boxes and CPCs were phased out at the same time, so that customers could be educated about other payment options at the CPCs while they are still open. The only way the CPC transition could be aided by leaving the drop

boxes in place after the CPCs close is if a customer who missed all notice of the CPC closure came to make a payment at the CPC for the sole purpose of avoiding postage and found the CPC closed. Such a customer might make use of the drop box. In other scenarios, however, customers would be better served if they learned about all other options before the CPCs closed.

**2. Alternative Pay Agent Locations**

Another of Staff's recommendations is that "a payment agent be secured in the downtown Boise area, within five blocks of the Boise CPC." It is not clear whether Staff makes its support of Qwest's application regarding the Boise CPC contingent on securing such a location, however, the Commission should understand that it is unlikely that Qwest can meet this requirement if it is imposed. Qwest has been seeking alternative locations for an additional pay agent and has located one in the Albertson's Marketplace on State Street, as indicated in Qwest's Comments filed May 16, 2003. However, Qwest has not been able to find a suitable location "downtown". This is not surprising considering the mix of government and professional offices, "high end" retailers and restaurants that occupy so much of downtown space. None of these businesses is likely to agree to act as a payment agent for Qwest.

While Qwest understands that Staff would like to see customers have as little disruption to their routines as possible, it is not clear that proximity to Qwest's downtown location is the best solution. CPC users who drive may well find that parking is more convenient and less costly at a pay agent location such as the Albertson's Marketplace. Customers who ride the bus may also access other locations as conveniently as the downtown CPC. Furthermore, the fact that other locations tend to have longer hours and are open on weekends may well make them more convenient than a downtown location that is only open during "business hours" five days a week.

Qwest respectfully suggests that creating a requirement that Qwest secure a payment agent within five blocks of the current CPC location is not justified based on stated customer concerns and is not appropriate given that the Commission has not promulgated a rule or otherwise exercised its authority to regulate pay-in-person alternatives for other utilities.

**3. Regulation of Payment Agents and Web Site Changes**

Finally in addition to the foregoing Staff at page 7 of its Comments sets out a number of requirements for pay agent locations. Staff notes that it believes Qwest's payment agents comply with these requirements with the exception of handicap accessibility at some sites. In addition, Staff makes suggestions as to how Qwest's website should be modified to better alert customers to pay agent locations and use, in Staff's opinion. (Comments, p. 5)

Qwest does not wish to suggest that Staff's suggestions are not meritorious. However to the extent the Staff seeks to have these suggestions become requirements for Qwest's operations, it may be exceeding the appropriate scope of this docket. Qwest is not unique in having customers who are elderly, handicapped or experiencing financial difficulties. In fact many of the same individuals use the services of Qwest and other Idaho utilities. Nor is Qwest unique in using pay agents as the primary means of accepting in-person customer payments. If the Commission decides that it must impose requirements on the facilities used by Qwest's pay agents or on Qwest's website design, it should be prepared to impose similar requirements on all Idaho telephone corporations and other utilities. Qwest would be happy to participate in a generic docket to create such rules and regulations. However, these policy decisions should not be made in an ad hoc basis in this docket.

In conclusion, Qwest respectfully requests that the Commission approve Qwest's application and permit phase-out of its CPCs.

Respectfully submitted this <sup>21<sup>st</sup></sup> 20<sup>th</sup> day of May, 2003.

**Qwest Corporation**

A handwritten signature in black ink, appearing to read "Adam L. Sherr", is written over a horizontal line.

Mary S. Hobson  
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Adam L. Sherr  
Qwest  
Attorneys for Qwest Corporation

**CERTIFICATE OF SERVICE**

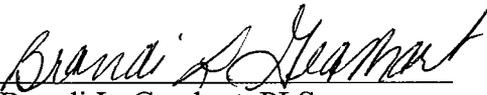
I HEREBY CERTIFY that on this <sup>21<sup>st</sup></sup> 20<sup>th</sup> day of May, 2003, the foregoing **REPLY COMMENTS OF QWEST CORPORATION** was served upon the following parties:

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