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July 16, 2003

VIA HAND DELIVERY

Jean D. Jewell, Secretary
Idaho Public Utilities Commission
472 West Washington
Boise, ID 83702-5983

RE: Docket No. QWE-T-03-10

Dear Ms. Jewell:

Enclosed for filing with this Commission is an original and seven (7) copies of the following:

1. Qwest Corporation's Petition For Clarification and/or Partial Reconsideration; and
2. Declaration of Beth Jordan in Support of Qwest Corporation's Petition for Clarification and/or Partial Reconsideration.

If you have any questions, please contact me. Thank you for your cooperation in this matter.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Mary S. Hobson".

Mary S. Hobson

:blg
Enclosures
cc: Service List

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Attorneys for Qwest Corporation

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

**QWEST CORPORATION'S PETITION FOR
CLARIFICATION AND/OR PARTIAL
RECONSIDERATION**

Qwest Corporation ("Qwest"), by and through its undersigned attorneys, hereby moves pursuant to Commission Rules of Procedure 325 and 331 for clarification and/or reconsideration of certain aspects of Order No. 29270 (the "CPC Order"). The Commission served the CPC Order on June 26, 2003. Pursuant to rule 331, this motion is timely if filed by July 17, 2003. This petition is supported by the Declaration of Beth Jordan, filed herewith.

I. INTRODUCTION

On March 12, 2003, Qwest filed an application seeking the Commission's approval for Qwest to phase out its Boise and Pocatello customer payment centers ("CPCs"). On April 9, 2003, the Commission set this matter for modified procedure. Public comments were accepted

by the Commission between April 9, 2003 and May 16, 2003. On June 26, 2003, the Commission entered the CPC Order granting Qwest's application, with certain conditions.

Qwest is grateful to the Commission for granting its application. It brings this petition not to challenge the Commission's core findings or conditions, but to seek clarification and/or reconsideration on two of the conditions the Commission set in the CPC Order – specifically, those conditions concerning the need for payment agent locations (“PALs”) to (a) post whether there is a fee or service charge for use of their services and to list the types of payment options available, and (b) accept payments from customers who do not present a copy of their Qwest bill or notice.

II. RELIEF REQUESTED

Qwest asks the Commission to remove the conditions that Qwest ensure that its Idaho PALs (a) clearly post whether there is a fee or service charge for use of their services and list the type of payment options available, and (b) accept payment even when Qwest's customer fails to present a copy of the Qwest bill or notice.

III. DISCUSSION

Reconsideration is appropriate if the petitioner can demonstrate that the portion of the order that is the subject of the petition is unreasonable. *IDAPA 31.01.01.331.01*. As described below, the conditions discussed in this petition are unworkable, unnecessary and/or potentially harmful to customers. As such, relief under rule 325 and/or 331 is appropriate.

1. Posting Fees/Service Charges and Payment Options. PALs are independent, unaffiliated businesses. In many cases, they accept payments for multiple utilities (not just Qwest). They may have different arrangements with different utilities in terms of fees they charge and other practices. Posting a sign specifically relating to taking Qwest payments may conflict with the information they may wish to impart concerning the products and services they

offer to their customers and with the information pertaining to other entities for which they accept payments. Qwest has no contractual right to require PALs to post a sign consistent with that condition set out in the CPC Order. Since Qwest cannot realistically enforce this particular mandate, Qwest asks the Commission to remove it as a condition of approval of Qwest's application to phase out the CPCs. This requirement may also cause confusion for customers who are paying bills for other entities who have different arrangements with the PAL.

In addition to this condition being unreasonably difficult to enforce and potentially confusing, it is unnecessary. Most Idaho PALs accepting Qwest payments do not charge fees. In its March 12 application, Qwest indicated there are currently 58 free PALs in Idaho. *Application, at ¶ 8.* Each of the existing 11 PALs in Boise and Pocatello – the cities relevant to this docket – accepts Qwest customer payments without charge. In addition, those few PALs statewide that charge a service fee verbally inform the Qwest customer that such a fee applies. Also, when a Qwest customer searches for the nearest PAL on Qwest's website, the website indicates whether a service charge will apply at a given location. Requiring Qwest to ensure that each of its scores of PALs in Idaho post a sign regarding service charges is both unworkable and unnecessary.

2. Accepting payment without bill or notice. Qwest also asks that the Commission remove its mandate that Qwest ensure that PALs accept payments from Qwest customers who do not present a Qwest bill or notice to the PAL agent. While it is technically possible for PALs to receive such payments,¹ Qwest advises PALs not to do so because of the potential confusion and interruption of service that can occur if payments are not tied to specific customer bills.

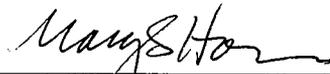
¹ Qwest accepts responsibility for not making clear previously that, while possible, accepting a payment without a bill or notice is potentially harmful. Qwest likely added to this confusion with its response to Staff Request for Production No. 7. Among other things, Staff asked if all PALs in southern Idaho locations other than Boise and Pocatello are *able to accept* payment if the customer does not provide a copy of a Qwest bill or notice. Qwest answered "yes" (which is accurate), but should have explained that while PALs technically can do so, Qwest discourages the practice because of the confusion it can cause.

When a PAL electronically logs a customer's payment, it needs both the customer's ten-digit billed telephone number ("BTN") and the three digit customer code that appears on the customer's bill or notice. Because multiple customers (e.g., an existing customer and a former customer that was disconnected with an unpaid balance) can have the same BTN, the three digit customer code ensures that the payment is applied to the correct account. This is critical to avoiding misapplication of payments. Misapplication can result in interruption of service if payment is posted to one account when another account under the same BTN is delinquent and nearing disconnection. It is not unreasonable, nor does it cause a hardship, to expect or require a customer to bring his or her bill or notice when making a payment. Given the risk of confusion and service interruption, Qwest believes that the condition set out in the CPC Order is counterproductive.

IV. CONCLUSION

For the foregoing reasons, Qwest requests that the Commission remove the two conditions of its CPC Order discussed above as prerequisites to Qwest's phasing out the Boise and Pocatello CPCs.

Qwest Corporation



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Stoel Rives LLP

Adam L. Sherr
Qwest

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2003, I served the foregoing **QWEST CORPORATION'S PETITION FOR CLARIFICATION AND/OR PARTIAL RECONSIDERATION** upon all parties of record in this matter as follows:

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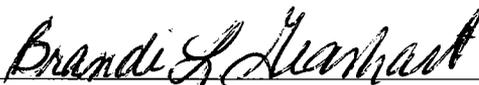
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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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

Case. No. QWE-T-03-10

**DECLARATION OF BETH JORDAN IN
SUPPORT OF QWEST CORPORATION'S
PETITION FOR CLARIFICATION AND/OR
PARTIAL RECONSIDERATION**

I, MARY E. ("BETH") JORDAN make this declaration based upon my personal knowledge. I am over the age of 18 and am otherwise competent to testify as to the matters set forth herein.

1. I am a Payment Agent Assistant in Qwest's Consumer Financial Services unit. My responsibilities include management and administration of Qwest's relationships with its many outside payment agent locations ("PALs") in Idaho and other states. I assisted Qwest's in obtaining and providing information in response to the Commission Staff's data requests in this docket.

2. I understand that the Commission has placed certain conditions on its approval of Qwest's application to phase out the Boise and Pocatello customer payment centers ("CPCs"). I understand those conditions include a requirement that PALs post a sign stating whether a fee or service charge will be imposed for use of the PAL's services and to list the types of payment options available. I further understand that the Commission has required that the PALs accept payments from customers who do not present a copy of their Qwest bill or notice. Based on my experience and knowledge, I have concerns regarding both of these conditions.

3. The PALs on which Qwest relies are independent, unaffiliated businesses that in many cases accept payments for other utilities as well as for Qwest. The arrangements the PALs have with other entities may differ from those they have with Qwest in terms of the practices that they follow and the fees they may charge. Qwest does not have a contractual right to require these PALs to post signs relating to the terms under which they will accept payments for Qwest. Furthermore, asking them to do so could conflict with the information they wish customers to receive about the services offered by their businesses as well as the information that pertains to the services they perform on behalf of other entities. This could cause customer confusion. Because of these conflicts and the potential confusion that could ensue, Qwest cannot realistically enforce whether the PALs post a sign indicating whether they charge a fee or service charge in connection with accepting Qwest payments and indicating all other payment options.

4. I also believe the Commission's posting requirement is unnecessary. Most Idaho PALs accepting Qwest payments do not charge fees. There are currently 58 free PALs in Idaho, including all of the eleven PALs in Boise and Pocatello. In addition, those few PALs outside of Boise and Pocatello that charge a service fee inform the customer of that fact before taking their

payments. Also Qwest's website indicates whether a service charge will apply at a given location.

5. I am also concerned with the second condition that the PALs take payments without a copy of the bill or notice. While it is possible for PALs to receive such payments, Qwest advises against it because of the problems that can occur.

6. When a PAL electronically logs a customer's payment, it needs the three digit customer code that appears on the customer's bill or notice as well as the customer's ten-digit billed telephone number ("BTN"). The three digit customer code ensures that the payment is applied to the correct account, which is important because more than one customer may have the same BTN. For example both an existing customer and a former customer who was disconnected with an unpaid balance could have the same BTN. If the existing customer made a payment at a PAL without a document containing the three digit customer code, the payment could be inadvertently applied to the former customer's unpaid balance. Such misapplication can result in interruption of service on a current account that is delinquent and nearing disconnection.

I declare the foregoing to be true under penalty of perjury and in accordance with the laws of the States of Arizona and Idaho.

DATED this 14 day of July, 2003, at Phoenix, Arizona.


BETH JORDAN

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of July, 2003, I served the foregoing
DECLARATION OF BETH JORDAN upon all parties of record in this matter as follows:

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