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Attorney for the Commission Staff

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF QWEST )  
CORPORATION'S REVISIONS TO THE ) CASE NO. QWE-T-03-23  
IDAHO QWEST PERFORMANCE )  
ASSURANCE PLAN (QPAP) ) MOTION TO EXTEND TIME FOR  
FILING COMMENTS )**

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**COMES NOW** the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, and files this Motion to Extend Time for Filing Comments. The Commission issued a Notice of Application and Notice of Modified Procedure in Case No. QWE-T-03-23 on July 27, 2007, setting August 17, 2007 as the deadline for filing written comments.

On June 26, 2007, Qwest filed a Notice of Stipulation regarding certain performance indicator definitions (PIDs) and Qwest's Performance Assurance Plan (QPAP) provisions. The PIDs and QPAP are part of Qwest's Statement of Generally Available Terms and Conditions that provides terms for competitive local exchange carriers to interconnect with Qwest's local service facilities. The filing also includes a Motion by Qwest, on its own behalf and by three competitive local exchange companies (CLECs), for approval of the proposed changes to the QPAP. Qwest, Eschelon Telecom, Inc., DIECA Communications, Inc. dba Covad Communications Company, and McLeodUSA Telecommunications Services, Inc. agreed to the changes to the PIDs and the QPAP in meetings held between May 23, 2006 and May 17, 2007. Qwest requested that the Commission accept the Stipulation describing the proposed changes

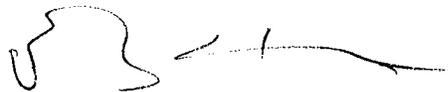
and apply the changes to any interconnection agreements containing the Performance Assurance Plan, and also to allow the PID changes to go into effect no later than 60 days in accordance with 47 U.S.C. § 252(f)(3).

The Stipulation was filed in all 14 Qwest states and is currently being discussed as a multi-state matter by the Regional Oversight Committee (ROC) staff. Only three CLECs are parties to the Stipulation and the proposed alterations to the PIDS and QPAP may affect other CLECs that are not a party to the Stipulation. Staff believes Qwest's filing should be carefully reviewed and that more time is needed to evaluate the impact the proposed Tier 1 and Tier 2 penalty payments have on other CLECs and states. The ROC staff has informally requested that Qwest provide revenue impact analysis using the last two years of actual Tier 1 and Tier 2 payments to CLECs and states, and to provide projected revenue payments using the proposed revisions in the Stipulation.

On August 6, 2007, the chairman of the ROC delivered a letter to Qwest asking for an extension of time, until September 28, 2007, to allow states time to determine the revenue impact to other CLECs or State Commissions. In a letter to Staff dated August 14, 2007, Qwest stated it "will not oppose an extended review through September 28, 2007."

Staff requests that the Commission issue an Order extending the time for filing written comments in this case until September 28, 2007. The additional time will allow Staff and interested parties the opportunity to obtain additional information from Qwest and to evaluate the affect of the changes on CLECs and on Tier 1 and Tier 2 payments.

Respectfully submitted this 15<sup>th</sup> day of August 2007.



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Weldon B. Stutzman  
Deputy Attorney General

bls/N:QWET0323\_ws\_Motion

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 15<sup>th</sup> DAY OF AUGUST 2007, SERVED THE FOREGOING **MOTION TO EXTEND TIME FOR FILING COMMENTS**, IN CASE NO. QWE-T-03-23, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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