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BEFORE THE PUBLIC UTILITIES COMMISSION OF IDAHO

IN THE MATTER OF THE FURTHER) Case No. QWE-T-05-10
CONSOLIDATION OF RATE)
CENTERS FOR QWEST) PETITION OF QWEST
CORPORATION IN SOUTHERN) CORPORATION
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Qwest Corporation (Qwest), pursuant to Rule 53 of the Commission's Rules of Practice and Procedure, *IDAPA 31.01.01.053*, requests that that Commission modify its Order No. 28943, which consolidated certain rate centers in Qwest's southern Idaho territory. Specifically Qwest requests that the consolidated rate center containing the Boise and Idaho City exchanges be consolidated with the rate center containing the Kuna, Meridian, Middleton and Star exchanges. This Petition is based on the following:

I. BACKGROUND

1. On its own motion in September 1999, the Commission initiated an investigation to examine various actions that had the potential to delay the need for additional telephone area

codes in Idaho. Rate center consolidation was one of the options considered because it reduces the number of rate centers in a local calling area and, consequently, conserves NXX prefixes.

2. After exploring other options for sustaining the 208 area code, and after allowing interested parties to offer comment, on February 1, 2001, the Commission entered Order No. 28943, which created certain consolidated rate centers. One such center, designated "Boise," consisted of the Boise and Idaho City exchanges; another, designated "Meridian," consisted of the Kuna, Meridian, Middleton and Star exchanges.

3. Since the entry of Order No. 28943, commercial activity in the Treasure Valley, and particularly in Ada County, has increased. Some of Qwest's larger customers have business operations located in both the Boise and Meridian rate centers. Qwest finds that it cannot meet all of customers' needs to integrate the operations of these business customers without the ability to port local numbers between the Meridian and Boise consolidated rate centers.

4. Pursuant to federal regulation, numbers cannot be ported between rate centers.¹

II. REQUESTED MODIFICATION

5. Qwest asks that the Commission consolidate the Meridian and Boise rate centers. Because these two rate centers presently have slightly different local calling areas, Qwest also asks that the Commission modify the local calling area for the Qwest customers in the consolidated Meridian rate center to facilitate this consolidation request. Qwest does not request compensation for the implementation of the requested consolidation or for changes to the local calling area.

¹ See 47 CFR § 52.26 (a), adopting the report of the North American Numbering Council Working Group, dated April 25, 1998. That report states at Section 7.3, titled "LNP Portability Boundary," ". . . location portability is technically limited to rate center/rate district boundaries of the incumbent LEC due to rating/routing concerns."

6. One of the criteria used by the Commission in determining how rate centers should be consolidated is whether the exchanges that are candidates for consolidation have identical local calling areas. Over the past several years, this Commission has created very large local calling areas in southern Idaho by granting extended area service (EAS) between the exchanges operated by Qwest and, in some cases, those of other Idaho telecommunications corporations. These EAS regions have accorded customers toll-free access to business and residents throughout the Treasure Valley and surrounding communities.

7. The six exchanges affected by this Petition, i.e., Boise, Idaho City, Kuna, Meridian, Middleton and Star, do not have identical EAS calling areas. Boise and Idaho City have EAS to the Lowman exchange, which is operated by Cambridge Telephone Company (Cambridge), while the exchanges in the consolidated Meridian rate center do not have toll-free calling to Lowman.

8. To facilitate further rate center consolidation and provide the customer benefits, including the ability to port local numbers between exchanges, Qwest requests that the Commission expand the local calling area of its Kuna, Meridian, Middleton and Star exchanges to include Lowman.

9. Qwest proposes that it implement the EAS routes to provide one-way local calling to Lowman from its Kuna, Meridian, Middleton and Star exchanges at its own expense.

10. Should Cambridge decide to expand its Lowman customers' local calling area to include Kuna, Meridian, Middleton and Star, Qwest also agrees to implement that expansion without requesting compensation for Qwest's lost access and toll revenues or for any additional implementation expense to accommodate a proposed two-way EAS.

11. Qwest acknowledges that the volume of calling and the customer demand for expansion of EAS between the consolidated Meridian rate center and Lowman do not rise to the levels that justified EAS expansion under the Commission's public interest standard. In contrast to typical EAS requests, in this case calling volumes are low² and the requested EAS expansion has little or no impact economic impact on either of the companies.³ The customers in the affected exchanges, however, can only benefit by expanded EAS.

12. Rather than meeting a customer demand for a larger local calling area, this EAS expansion is driven by the need to consolidate rate centers to facilitate other customer needs, including the ability to port numbers within the large commercial center located in the Treasure Valley.

13. In its initial order on rate center consolidation⁴ the Commission stated, "we find that consolidation will conserve the assignment of and promote greater efficiency in the use of NXX codes. This, in turn may extend the life of Idaho's area code." Bringing the Kuna, Meridian, Middleton and Star exchanges into the same consolidated rate center as Boise and Idaho City will advance these goals of efficient use and conservation of NXX codes and will serve to extend the life of Idaho's area code.

III. CONCLUSION

Granting this request for consolidation of the Meridian and Boise rate centers yields the benefits of conserving NXX codes and extending the life of the Idaho area code, as well as

² For the period August-October, 2004 calls originating in the Qwest exchanges of Kuna, Meridian, Middleton and Star and terminating in Lowman totaled 102, producing an average 34 per month.

³ Qwest, for example, estimates that it will lose substantially less than \$2000.00 per year in toll and originating access revenue should these four EAS routes be converted to EAS. Under the Qwest proposal for one-way EAS, Cambridge would retain its toll and originating access revenues.

⁴ Order No. 28943, *In the Matter of the Investigation into Rate Center Consolidation for Qwest Corporation in Southern Idaho to Conserve Available NXX Codes*, Case No. USW-T-99-21 (Feb. 1, 2002.)

allowing Qwest to meet customers' needs to port numbers within the Treasure Valley. Creation of EAS between the Qwest exchanges of Kuna, Meridian, Middleton and Star and the Cambridge exchange of Lowman will have little or no impact on the companies and can only benefit the customers located in the affected exchanges.

WHEREFORE, Qwest respectfully requests that:

1. The Commission modify its Order No. 28943 to consolidate the Boise rate center (consisting of the Boise and Idaho City exchanges) and the Meridian rate center (consisting of the Kuna, Meridian, Middleton and Star exchanges);
2. To affect the requested rate center consolidation, the Commission grant one-way EAS between the Qwest exchanges of Kuna, Meridian, Middleton and Star to the Cambridge exchange of Lowman;
3. The Commission find, pursuant to IPUC Rule of Procedure 201, that the public interest does not require a hearing to consider the issues presented and that the proceeding may be processed under modified procedure.

Respectfully submitted this 29th day of April, 2005.



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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of April, 2005, I served the foregoing **PETITION OF QWEST CORPORATION** upon all parties of record in this matter as follows:

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