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2005 JUN -1 AM 8:00
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Attorney for the Commission Staff

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE PETITION OF)	
QWEST CORPORATION FOR THE FURTHER)	CASE NO. QWE-T-05-10
CONSOLIDATION OF RATE CENTERS IN)	
SOUTHERN IDAHO.)	COMMENTS OF THE
)	COMMISSION STAFF
)	
)	

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Weldon B. Stutzman, Deputy Attorney General, in response to the Notice of Petition and Notice of Modified Procedure in Case No. QWE-T-05-10 issued on May 11, 2005, and submits the following comments.

On April 29, 2005, Qwest filed a Petition requesting an Order authorizing the consolidation of its Meridian and Boise rate centers. Because the rate centers do not have identical local calling areas, consolidation of the two centers would require the Commission to expand the local calling area of the Kuna, Meridian, Middleton and Star exchanges to include Lowman. Lowman is served by Cambridge Telephone Company. Qwest in its Petition proposes that the Commission grant one-way EAS between its exchanges and the Lowman exchange.

The Commission previously investigated consolidation of rate centers as a way to conserve NXX prefixes. In February 2001 the Commission issued Order No. 28943, which consolidated rate centers in Qwest's service area. The new Boise rate center includes the Boise

and Idaho City exchanges, and the Meridian rate center includes the Kuna, Meridian, Middleton and Star exchanges. Qwest's Petition asserts that consolidation of the Boise and Meridian exchanges is necessary for it to port local numbers between Boise and Meridian for its customers..

Consolidating the Boise and Meridian exchanges would require modification of the local calling area for Meridian customers. Customers in the Boise and Idaho City exchanges have toll-free extended area service (EAS) to the Lowman exchange, and customers in the Meridian rate center do not. Qwest proposes to provide one-way EAS from the exchanges in the Meridian rate center to Lowman. Service is provided in Lowman by Cambridge Telephone Company. Qwest does not seek reimbursement for implementing EAS for its Meridian rate center customers. Should Cambridge Telephone decide to expand the Lowman EAS to include the Meridian exchanges, Qwest asserts it would implement two-way EAS without compensation for lost access and toll revenues.

STAFF COMMENTS

Staff has reviewed the information provided by Qwest in this Petition and finds no objection. In addition, Staff's discussion with Cambridge Telephone Company's President, Richard Wiggins, indicates his preference for the implementation of two-way EAS, versus a more confusing, one-way EAS between Lowman and the Meridian exchanges. An annual long distance cost study conducted by Cambridge shows minimal financial impact of two-way EAS. Staff recommends the Commission approve Qwest's Petition for consolidation of Boise and Meridian rate centers to include Lowman and that two-way EAS be implemented between Cambridge Telephone's Lowman exchange and the Qwest exchanges in the Meridian rate center that includes Meridian, Kuna, Middleton, and Star, with each company bearing any cost to implement EAS.

Respectfully submitted this

1st

day of June 2005.



Weldon B. Stutzman
Deputy Attorney General

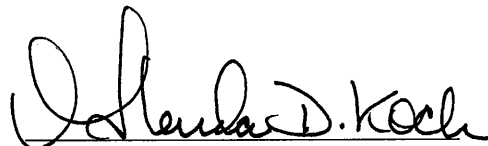
Technical Staff: Grace Seaman
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 1ST DAY OF JUNE 2005, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. QWE-T-05-10, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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