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IDAHO PUBLIC  
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101 S. Capitol Boulevard, Suite 1900  
Boise, Idaho 83702  
main 208.389.9000  
fax 208.389.9040  
www.stoel.com

December 22, 2005

MARY S. HOBSON  
Direct (208) 387-4277  
mshobson@stoel.com

**VIA HAND DELIVERY**

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074

**Re: Case No. QWEST-05-24  
APPLICATION FOR APPROVAL OF AGREEMENT TO ADOPT  
COMMPARTNERS LLC AGREEMENT**

Dear Ms. Jewell:

Enclosed for filing with this Commission on behalf of Qwest Corporation is an original and three (3) copies of the **Application for Approval of Agreement to Adopt CommPartners LLC Agreement**. The CommPartners LLC Application for Approval of Agreement to Adopt SGAT was approved by this Commission on October 13, 2005, by Order #29889. Qwest respectfully requests that this matter be placed on the Commission Decision Meeting Agenda for expedited approval.

Please contact me if you have any questions concerning the enclosed. Thank you for your assistance in this matter.

Very truly yours,

Handwritten signature of Mary S. Hobson in cursive script.  
Mary S. Hobson

:blm  
Enclosure  
cc: Service List

Mary S. Hobson (ISB# 2142)  
Stoel Rives LLP  
101 South Capitol Boulevard – Suite 1900  
Boise, ID 83702  
Telephone: (208) 389-9000  
Facsimile: (208) 389-9040  
[mshobson@stoel.com](mailto:mshobson@stoel.com)

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**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

**APPLICATION OF QWEST  
CORPORATION FOR APPROVAL OF  
THE ADOPTION OF THE  
COMMPARTNERS LLC AGREEMENT  
(APPROVED BY THE COMMISSION ON  
OCTOBER 13, 2005 [ORDER NO. 29889],  
IN DOCKET NO. QWE-T-05-15) FOR  
THE STATE OF IDAHO PURSUANT TO  
47 U.S.C. §252(e)**

CASE NO.: QWE-T-05-24  
**APPLICATION FOR APPROVAL OF  
AGREEMENT TO ADOPT  
COMMPARTNERS LLC AGREEMENT**

Qwest Corporation (“Qwest”) hereby files this Application for Approval of Agreement to adopt CommPartners LLC Agreement (“Agreement”). The Agreement with Red-Ban Communications, LLC (“Red-Ban”) is submitted herewith.

This Agreement was reached through voluntary negotiations without resort to mediation or arbitration and is submitted for approval pursuant to Section 252(e) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 (the “Act”).

Section 252(e)(2) of the Act directs that a state Commission may reject an agreement reached through voluntary negotiations only if the Commission finds that: the agreement (or portion(s) thereof) discriminates against a telecommunications carrier not a party to this agreement; or the implementation of such an agreement (or portion) is not consistent with the public interest, convenience and necessity.

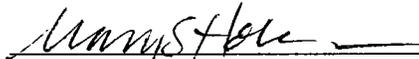
Qwest respectfully submits that this Agreement provides no basis for either of these findings, and, therefore requests that the Commission approve this Agreement expeditiously. This Agreement is consistent with the public interest as identified in the pro-competitive policies

of the state of Idaho, the Commission, the United States Congress, and the Federal Communications Commission. Expeditious approval of this Agreement will enable Red-Ban to interconnect with Qwest facilities and to provide customers with increased choices among local telecommunications services.

Qwest further requests that the Commission approve this Agreement without a hearing. Because this Agreement was reached through voluntary negotiations, it does not raise issues requiring a hearing and does not concern other parties who were not party to the negotiations. Expeditious approval would further the public interest.

Respectfully submitted this 22<sup>nd</sup> day of December, 2005.

**Qwest Corporation**



Mary S. Hobson  
Stoel Rives LLP, Attorneys for Qwest

**CERTIFICATE OF SERVICE**

I hereby certify that on this 22<sup>nd</sup> day of December, 2005, I served the foregoing **APPLICATION FOR APPROVAL OF AGREEMENT TO ADOPT COMMPARTNERS LLC AGREEMENT** upon all parties of record in this matter as follows:

Jean Jewell, Secretary  
Idaho Public Utilities Commission  
472 West Washington Street  
P.O. Box 83720  
Boise, Idaho 83720-0074  
[jjewell@puc.state.id.us](mailto:jjewell@puc.state.id.us)

Hand Delivery  
 U. S. Mail  
 Overnight Delivery  
 Facsimile  
 Email

Rich Redman  
Red-Ban Communications LLC  
1075 South Highway 77  
Albion, ID 83311  
Telephone: (208) 673-2201

Hand Delivery  
 U. S. Mail  
 Overnight Delivery  
 Facsimile  
 Email



\_\_\_\_\_  
Brandi L. McMahon, PLS  
Legal Secretary to Mary S. Hobson  
Stoel Rives LLP



November 30, 2005

Red-Ban Communications, LLC  
Rich Redman, Member Manager  
1075 S. Hwy 77  
Albion, Idaho 83311  
Phone 208-673-2201

Dear Mr. Rich Redman:

We have received your request that, under Section 252(i) of the Telecommunications Act of 1996, Red-Ban Communications, LLC ("CLEC") wishes to adopt in its entirety, the terms of the Interconnection Agreement and any associated amendments, if applicable, (the "Underlying Agreement") between CommPartners, LLC and Qwest Corporation fka U S WEST Communications, Inc. ("Qwest") that was approved by the Commission on October 11, 2005 as an effective agreement in the State of Idaho. CLEC is incorporated in the state of Utah. We understand you have a complete copy of the Underlying Agreement.

By their respective signatures below, Qwest and CLEC ("the Parties") intend that this letter serve as their agreement ("Letter Agreement") for CLEC to adopt the Underlying Agreement under the following terms and conditions:

1. The Parties shall request the Commission to expedite its review and approval of this Letter Agreement. This Letter Agreement shall become effective upon such approval. If for some reason the Commission rejects all or part of the Letter Agreement, either Party may at its option declare the remainder of the Agreement void and be excused from any performance thereunder.
2. Notwithstanding the mutual commitments set forth herein, Qwest is entering into this Letter Agreement without prejudice to any positions it has taken previously, or may take in the future, in any legislative, regulatory, or other public forum addressing any matters, including those relating to the types of arrangements contained in the Underlying Agreement. During the proceeding in which the Commission is to review and approve the Letter Agreement, Qwest may point out that it has objected, and continues to object, to the inclusion of the terms and conditions to which it objected in the proceedings involving the approval of the Underlying Agreement.
3. CLEC adopts the terms and conditions of the Underlying Agreement for interconnection with Qwest and in applying the terms and conditions, agrees that Red-Ban Communications, LLC be substituted in place of "CommPartners, LLC" throughout the Underlying Agreement wherever the latter appears.
4. Qwest requests that notice to Qwest Corporation as may be required under the Underlying Agreement shall be provided as follows:

Qwest Corporation  
Director Interconnection Agreements  
1801 California Street, Room 2410  
Denver, CO 80202  
303-965-3029  
Email – IntAgree@qwest.com

With copy to:  
Qwest Corporation Law Department  
Attention: General Counsel, Interconnection  
1801 California Street, 10th Floor  
Denver, CO 80202

CLEC requests that notice to CLEC as may be required under the Underlying Agreement shall be provided as follows:

Red-Ban Communications, LLC  
Rich Redman, Member Manager  
1075 S. Hwy 77  
Albion, Idaho 83311  
Phone 208-673-2201  
Fax 208-673-6200  
Email rich@atcnet.net

5. CLEC represents and warrants that it is a certified provider of local dialtone service in the State of Idaho and that this Agreement will cover services in that state only.

6. Please sign all three original copies of this letter, and overnight them within sixty (60) days to:

Qwest Corporation  
Manager of Interconnection  
1801 California St, Suite 2420  
Denver, CO 80202  
Phone: 303-965-3029

After sixty (60) days Qwest may rescind its willingness to consider the Agreement's terms and conditions.

7. Please note that Qwest will file this Letter Agreement with the appropriate state commission for approval; however, some state commissions will not approve the Letter Agreement until the CLEC is certified by the state commission. You may want to contact the appropriate state commission to determine the requisite filing guidelines.

Sincerely,

Date

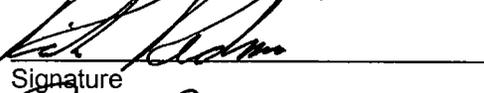


12/16/05

Qwest Corporation  
L.T. Christensen  
Director – Interconnection Agreements  
1801 California Street, Suite 24th Floor  
Denver, Colorado 80202

I agree to all terms and conditions contained in this letter as indicated by my signature below:

Red-Ban Communications, LLC

  
Signature

Rich Redman  
Name Printed

Member Manager  
Title

12/12/05  
Date