

Mary S. Hobson
Attorney & Counselor
999 Main, Suite 1103
Boise, ID 83702
208-385-8666

RECEIVED
2006 OCT 20 PM 4:50
IDAHO PUBLIC
UTILITIES COMMISSION

October 20, 2006

VIA HAND DELIVERY

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

RE: Docket No. QWE-T-06-10

Dear Ms. Jewell:

Enclosed for filing with this Commission are an original and seven (7) copies of **Qwest Corporation's Response to Petition for Reconsideration**. If you have any questions, please contact me. Thank you for your cooperation in this matter.

Very truly yours,


Mary S. Hobson

Enclosures

cc: Service List

Mary S. Hobson (ISB. No. 2142)
999 Main, Suite 1103
Boise, ID 83702
Tel: 208-385-8666
mary.hobson@qwest.com

RECEIVED

2006 OCT 20 PM 4: 20

IDAHO PUBLIC
UTILITIES COMMISSION

Adam L. Sherr
Corporate Counsel, Qwest
1600 7th Avenue, Room 3206
Seattle, WA 98191
Tel: (206) 398-2507
adam.sherr@qwest.com

Attorneys for Qwest Corporation

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

<p>JOHN C. DOWNEY, D.C.</p> <p>Complainant, v.</p> <p>QWEST CORPORATION</p> <p>Respondent.</p>	<p>Case No. QWE-T-06-10</p>
<p>RESPONSE OF QWEST CORPORATION TO PETITION FOR RECONSIDERATION</p>	

Qwest Corporation (Qwest) by and through its undersigned attorneys responds the request for reconsideration of John C. Downey as follows:

Complainant submitted a letter dated October 4, 2006 to the Commission requesting reconsideration of Order No. 30129, the final order in this case. That letter was not served on Qwest but was forwarded to Qwest by the Commission Staff on October 13. In addition to its defective service, the letter fails to meet the Commission's requirements for a petition for reconsideration as provided by the Commission's rules of Procedure and offers no basis for reconsideration.

Pursuant to Commission Rule of Procedure 331, a petition for reconsideration must "set forth specifically the ground or grounds why the petitioner contends that the order or any issue decided in the order is unreasonable, unlawful, erroneous or not in conformity with the law, and a statement of the nature and quantity of evidence for argument the petitioner will offer if reconsideration is granted." IDAPA 31.01.01.331.01. In his letter Complainant did not attempt to specifically identify any legal or factual error made by the Commission, and instead raised the same arguments presented in his prior written comments. Complainant's request merely restates his disagreement with the conclusion reached by the Commission in Order No. 30129.

A petition for reconsideration must also state whether the petitioner requests reconsideration by evidentiary hearing, written briefs, comments, or interrogatories. IDAPA 31.01.01.331.03. Complainant's request did not provide a statement of the nature and quantity of evidence or argument that would be offered if reconsideration were granted, nor did Complainant indicate whether reconsideration should proceed by

evidentiary hearing, written briefs, comments, or interrogatories. Accordingly, the Commission should deny Complainants' request for reconsideration.

Dated this 20th day of October, 2006.

Respectfully submitted,



Mary S. Hobson (ISB. No. 2142)
999 Main. Suite 1103
Boise, ID 83702

Adam L. Sherr
Corporate Counsel, Qwest
1600 7th Avenue, Room 3206
Seattle, WA 98191

Attorneys for Qwest Corporation

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing **RESPONSE OF QWEST CORPORATION TO PETITION FOR RECONSIDERATION** was served on the 20TH day of October, 2006 on the following individuals:

Jean D. Jewell	<u> X </u>	Hand Delivery
Idaho Public Utilities Commission	<u> </u>	U. S. Mail
472 West Washington Street	<u> </u>	Overnight Delivery
P.O. Box 83720	<u> </u>	Facsimile
Boise, ID 83702	<u> </u>	Email
Telephone (208) 334-0300		
Facsimile: (208) 334-3762		
jjewell@puc.state.id.us		

Cecelia Gassner	<u> X </u>	Hand Delivery
Idaho Public Utilities Commission	<u> </u>	U. S. Mail
472 West Washington Street	<u> </u>	Overnight Delivery
P.O. Box 83720	<u> </u>	Facsimile
Boise, ID 83702	<u> </u>	Email
Telephone (208) 334-0300		
Facsimile: (208) 334-3762		

John C. Downey, D.C.	<u> </u>	Hand Delivery
104 East Pine	<u> X </u>	U. S. Mail
Caldwell, ID 83605	<u> </u>	Overnight Delivery
Telephone: (208) 459-4354	<u> </u>	Facsimile
	<u> </u>	Email



Mary S. Hobson