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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 EXEMPTION) **CASE NO. QWE-T-08-2**
FROM CERTAIN PROVISIONS OF RULE 201,)
IDAPA 31.41.01.201.) **COMMENTS OF THE**
) **COMMISSION STAFF**
)

COMES NOW the Staff of the Idaho Public Utilities Commission, by and through its Attorney of record, Kristine A. Sasser, Deputy Attorney General, and in response to the Notice of Petition and Notice of Modified Procedure issued in Order No. 30539 on April 23, 2008 in Case No. QWE-T-08-2, submits the following comments.

BACKGROUND

On April 2, 2008, Qwest Corporation filed a Petition with the Commission, pursuant to IDAPA 31.41.01.009, seeking a permanent exemption from certain provisions of the Commission's Telephone Customer Relations Rule 201, IDAPA 31.41.01.201. In particular, Rule 201 pertains to the itemized content of telephone bills for residential and small business customers. Qwest wishes to offer its customers a "Summary Statement" in lieu of the detailed information contained in the Company's current bill.

The Company contends the Summary Statement option was created in response to customer demand for simplified billing. In order to receive a Summary Statement, a customer must affirmatively select the change to their billing statement. Customers who do not affirmatively request a Summary Statement will continue to receive the standard bill, which complies with the detailed requirements set forth in Rule 201, IDAPA 31.41.01.201.

The Company asserts that customers who choose to receive a Summary Statement may switch back to standard billing at any time, without charge or penalty. In addition, customers who have chosen a Summary Statement may still review the standard detailed billing information for their account on the Company's website at any time.

Telephone Customer Relations Rule 201 requires bills to include: Billing date; due date; time period covered by the bill; total amount due; past due amounts; toll-free telephone number for billing inquiries; an itemization of all non-recurring charges; and an itemization of recurring charges such as monthly exchange service, equipment leases, taxes, surcharges, fees, and custom calling features. IDAPA 31.41.01.201.

The Company claims that its proposed Summary Statement provides the most important billing information that customers are looking for, i.e., billing date, due date, total amount due, past due amounts (if any), payments received since the prior billing, billing totals for each class of service, summary of information about taxes and surcharges, and information about service provided by third parties, including contact information for questions regarding third-party billing.

The Petition states that the Company's objective is to provide customers with more options and to respond to customer demand for simplified billing information. The Company asserts that strict adherence to the detailed requirements of Rule 201 would prohibit Qwest from making an option available to customers that would reduce the volume and complexity of their bills, thereby working a hardship on the Company and its customers. *See* IDAPA 31.41.01.009.

STAFF ANALYSIS

Staff supports the Company's request for permanent exemption from certain provisions of Rule 31.41.01.201 (Rule 201) with certain conditions. Rules 201.01.j and 201.01.k require detailed itemization of all non-recurring and most recurring charges on bills for residential and small business local exchange service. These provisions restrict the Company's ability to offer

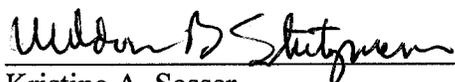
customers the option of a simplified billing statement that does not contain the amount of detail currently required. Staff recommends that Qwest be granted an exemption to these specific provisions rather than a general exemption to the entire rule.

Offering a variety of billing options to customers is an essential component of good customer service. Qwest states that it intends to offer the Summary Statement to customers as an alternative to the standard billing format, which contains the detailed information required by Rule 201. Customers who choose the Summary Statement will still be able to obtain recent detailed information from Qwest on the Company's website, by telephone inquiry and by paper copy upon request. Currently, customers are charged for paper copies of bills that are older than six months. Customers who have an online account have access to twelve months of billing detail online, and are charged for paper copies of bills older than twelve months. Staff recommends that the permanent exemption be granted with the condition that the billing detail required by Rule 201 continue to be available to customers without charge on Qwest's website or by telephone inquiry for a period covering a minimum of twelve consecutive monthly billing statements. Staff believes it is important that customers for a reasonable period of time be able to obtain detailed billing information if necessary. Granting an exemption with this condition will not place any additional burdens on the Company and will assure customers that the opportunity to obtain important information will be preserved.

RECOMMENDATIONS

Staff recommends that Qwest be granted a permanent exemption to Rules 201.01.j and 201.01.k with the condition that the Company continue to make billing detail available to customers without charge on Qwest's website or by telephone inquiry for a period covering a minimum of twelve consecutive monthly billing statements.

Respectfully submitted this 14th day of May 2008.


for Kristine A. Sasser
Deputy Attorney General

Technical Staff: Beverly Barker

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT I HAVE THIS 14TH DAY OF MAY 2008, SERVED THE FOREGOING **COMMENTS OF THE COMMISSION STAFF**, IN CASE NO. QWE-T-08-2, BY MAILING A COPY THEREOF, POSTAGE PREPAID, TO THE FOLLOWING:

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