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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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| IN THE MATTER OF IMPROVING OR REPLACING U S WEST COMMUNICATION REVENUE SHARING PLAN FOR SOUTHERN IDAHO. | ))))))) | CASE NO. USW-S-95-4 |

STAFF COMMENTS ADDRESSING QUALITY OF SERVICE

STANDARDS

COMES NOW the Staff of the Idaho Public Utilities Commission and submits the following comments pursuant to Order No. 26395 in the above referenced case.  In Order No. 26395, the Commission allowed U S WEST Communications to withdraw its proposed alternative form of regulation (AFOR) that was intended to replace the existing Revenue Sharing Plan governing the operations of U S WEST in its southern Idaho service area.  The Commission allowed the  AFOR to be withdrawn, but then questioned whether there was a need to continue this proceeding given U S WEST’s statement that it intends to file a general rate case.  The Commission subsequently invited the parties to submit written comments “on how the issues of service quality and EAS compensation can be addressed and whether this should be done in this case or through another venue.”  Order No. 26395 at 4.  Under separate cover, the Commission Staff and U S WEST have filed a joint stipulation and settlement addressing the EAS compensation issue.  Incorporated herein are Staff comments addressing the service quality issue.

As the Staff indicated in its Response to U S WEST’s Motion to Withdraw Joint Proposal, the Company “still has serious [service quality] problems to address.”  However, Staff proposes that the best course of action at this time would be to open a rulemaking docket to develop service quality standards for all local exchange providers.  See Order No. 26395 at 3.  Opening a docket to examine service quality issues would allow incumbents, new entrants, and the public to  effectively participate.

This recommendation tracks with the position taken by U S WEST in its Petition for Reconsideration in the forerunner to this proceeding.  There U S WEST stated that service “quality standards are appropriate only if they apply to the industry...on a prospective basis.”  Petition for Reconsideration at 36, 38 (Case No.  USW-S-94-3).  If the Commission agrees to follow this course of action, then Case No. USW-S-95-2 could be closed.

In summary, the Staff believes that it is appropriate for the Commission to initiate a rulemaking proceeding to establish service quality standards applicable to all local exchange service providers.

RESPECTFULLY submitted this                  day of April 1996.

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