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UTILITIES COMMISSION17933 N.W. Evergreen Parkway
P.O. Box 1100
Beaverton, OR 97075

May 22, 2003

Commissioner Kjellander
Commissioner Smith
Commissioner Hansen
Idaho Public Utilities Commission
472 W. Washington
Boise, Idaho 83720

RE: Staff Decision Memo for Verizon's Call Completion Service

You will be asked by the Commission's Consumer Assistance Staff to make a decision on this issue at the May 28, 2003 Decision Meeting. Verizon urges the Commission not to adopt the Staff recommendation to reinstate this Call Completion Service prior to final approval of a tariff.

Verizon discovered that it was providing this service by accident to Idaho customers without a tariff in April of 2003. This service was turned off as soon as the Company realized what had happened. Verizon has never advertised the availability of this service to Idaho customers. Verizon did not send any bill inserts or place any print advertising advising Idaho customers that this service was available.

Verizon disagrees with the staff characterization that this service was **offered** without charge to Idaho customers for some time. If an Idaho customer attempted to utilize this service after dialing 411 directory assistance they would have heard a recorded message indicating that the call completion service would cost \$.75 per call. That \$.75 charge is the regulated charge for this service from the Verizon Washington tariff. Verizon did not charge Idaho customers for this service because there was no approved Idaho tariff or billing mechanism for Call Completion Service.

Verizon believes that being required to reinstate his service before the tariff is filed and approved and providing this service free of charge would not be equitable to the Company and would only add to the customer confusion that currently exists for this service.

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Verizon has committed to filing the tariff as soon as it possibly can, hopefully within a four-week time frame, however, Verizon must complete a cost study for this service before the filing can be made. Staff has indicated that they will review the filing as quickly as possible. We ask that you not adopt Staff's recommendation, but rather allow the Company to file an appropriate tariff for the service which will allow the Company to offer, provision and bill the service the correct way.

Thank you for the opportunity to comment on this issue.

Sincerely,



for Allan T. Thoms
Vice President – Public Policy and External Affairs