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November 26, 2008

BY HAND DELIVERY

Ted Boyer, Commission Chairman
Richard M. Campbell, Commissioner
Ron Allen, Commissioner
Utah Public Service Commission
Heber M. Wells Building
160 East 300 South, 4th Floor
Salt Lake City, Utah 84111

**Re: Objection, Protest and Request for Investigation -- Qwest Utah Access
Service Tariff Revisions Jurisdictional Report Requirements**

Dear Commissioners:

MCI Communications Services, Inc. d/b/a Verizon Business Services (“Verizon Business”) objects to and protests the filings (an original filing and a revised filing) made by Qwest Corporation (“Qwest”) to its Utah Access Service Tariff on October 30 and November 21, 2008, respectively, that generally modify Jurisdictional Report Requirements as more fully described below. (A copy of Qwest’s original and revised filings are attached hereto as Attachments 1 and 2 respectively.)

Verizon Business is an interexchange carrier (“IXC”) subject to the jurisdiction of the Commission that exchanges intrastate and interstate switched access traffic with Qwest. It is, therefore, a customer of Qwest and would be affected by changes that Qwest proposes to make in its Qwest Access Service Tariff.

Qwest proposes to modify the Jurisdictional Report Requirements in Section 2 of its Utah Access Service Tariffs by establishing a Percent Interstate Usage (“PIU”) floor for what it considers to be unidentified Feature Group D (“FGD”) terminating traffic. Qwest’s proposed revisions would result in a higher percentage of traffic being billed at intrastate

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rates (which are higher than interstate access rates) than at present, and thereby increase the amounts billed to Verizon and other access purchasers. Verizon, therefore, has a direct interest in this proceeding. Qwest's filings have an effective date of December 1, 2008.

While Qwest asserts that the revisions to the tariffs are being implemented to "reduce misuse of jurisdictional reporting," it has not demonstrated the existence or nature of the problem the tariff revisions purport to address, or explained why its proposed solution is appropriate. In addition, it is not clear how the new jurisdictional reporting mechanism would be implemented—for example, how Qwest would determine whether traffic has or "lacks sufficient originating information," what mechanism would be in place to enable carriers to resolve questions over the sufficiency of call originating information, and how any disputes would be resolved before Qwest automatically assigns a jurisdictional factor pursuant to its tariff revisions. Because clarity and proper implementation of the tariff revisions are important to carriers, like Verizon, who must take service under those tariffs, Verizon requests that the Commission investigate Qwest's proposed tariffs until these issues are adequately resolved to the satisfaction of Qwest's access customers.¹

Sincerely,

PARSONS BEHLE & LATIMER

/s/

William J. Evans

WJE/cvd

Attachments

cc: (w/ Attachments to all)
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¹ The Iowa Utilities Board and the South Dakota Public Utilities Commission have suspended similar tariff filings made by Qwest (IA Docket No. TF-08-180 and SD Docket TC08-127) and the Minnesota Public Utilities Commission opened a docket to conduct an investigation into the proposed tariff and request comments by December 10, 2008 and reply comments by January 9, 2009. (Docket No. P-421/AM-08-1351).