

**Qwest**

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March 6, 2009

Ms. Julie Orchard  
Utah Public Service Commission  
Heber M. Wells Building  
160 East 300 South, 4th Floor  
Salt Lake City, Utah 84111

Re: Docket 08-2430-1- Submission of Minnesota Commission Order on Qwest's Tariff

Dear Ms. Orchard:

As Qwest mentioned in its February 23, 2009 comments in this docket, the Minnesota Public Utilities Commission accepted the Minnesota Commission Staff's recommendation to approve Qwest's proposed changes with a few minor modifications to which Qwest agreed. Qwest indicated it would provide a copy of the written order as soon as it was available. Accordingly, enclosed with this letter is a copy of the Commission's February 27, 2009 order approving Qwest's proposed tariff modifications as revised.

Further, as this Commission can see, the Minnesota Commission reached its decision without an extensive proceeding that included prefiled testimony or an evidentiary hearing. Qwest continues to believe that this Commission should likewise do the same.

Qwest also notes the following analysis by the Minnesota Commission:

The Commission concurs with the Department and will approve the proposed tariff modifications as revised, subject to quarterly reporting requirements.

The record demonstrates that Qwest faces difficulty in receiving accurate, timely, and complete call detail from some interexchange carriers. While overall levels of unidentified interexchange traffic are below 1%, certain carriers have unidentified traffic levels significantly exceeding the 6% default threshold proposed here. Whether these high levels of unidentified traffic are due to inadvertence, inattentiveness, or some other factor, it is clear that neither Qwest nor its other access service customers should be forced to compensate for the lost revenues that under-reported intrastate usage represents.

The company's proposed 6% threshold is reasonable. It is well above the company's system-wide level of unidentified traffic (1%) and well above its affiliated interexchange carrier's level of unidentified traffic (0%). It would appear to have no reasonable likelihood of prejudicing any carrier making a good-faith effort to provide adequate call

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detail, and should unique and unforeseeable circumstances lead to that result, the carrier would be adequately protected by the documentation and dispute resolution provisions added to the modified tariff.

Accordingly, as Qwest mentioned in its February 23rd comments, Qwest's proposed tariff change will prevent IXCs from avoiding appropriate intrastate access charges, and thus, Qwest respectfully requests that the Commission approve Qwest's tariff with the modifications to which it has agreed.

If the Commission has any questions about this letter, please feel free to contact me.

Very truly yours,

Alex M. Duarte  
Qwest, Corporate Counsel- Utah  
Attorney for Qwest Corporation

Enclosure