

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

AR 492

In the Matter of a Rulemaking to Amend)
OAR Chapter 860, Division 023, 032 and)
034 to Adopt Rule Changes, Minimum)
Service Quality Standards for Providing)
Retail Telecommunications Services)

**OPENING COMMENTS FROM
CENTURYTEL
QWEST CORPORATION
SPRINT
VERIZON NORTHWEST INC.**

The Large Companies of Oregon consisting of CenturyTel, Qwest Corporation, Sprint and Verizon Northwest Inc. submit the following comments and recommendations regarding the rules proposed in AR 492, Section 16 (d).

1. General Comments

The Large Companies have reviewed the service quality standards as proposed in AR 492, Section 16 (d). The Large Companies provide these comments on this specific rule that needs to be modified. The Large Companies believe that the standards should establish the minimum acceptable performance baseline expected by all customers of carriers of basic local exchange service. Additionally, all service quality rules should include an exemption when a deficiency is not due to a carrier's performance, but to other circumstances outside of the carrier's control.

2. Specific Comments

A. 860-023-0055, 860-032-0012 and 860-034-0390, Section 16 (d)

Staff is proposing language to allow the telecommunications utilities to petition the Commission for an exemption from service quality reporting if it meets all service quality objectives for 12 months prior to the month in which the petition is filed. The Large Companies are in favor of such an exemption and agree with Staff that if there is not a service quality problem, reporting should not be required. The Large Companies however, believe it is not reasonable to require that all service quality standards need to be met in order to petition the Commission for a waiver from reporting. Providers should be able to ask for a waiver if they meet any individual service quality standard for the previous 12 months. This is the only fair way to establish the new exemption language. Even though the complexity of their service offerings and size of their territories make it difficult for the Large Companies to meet all the service quality standards for 12 consecutive months, each company has a number of standards that it has consistently met. The Large Companies believe that if they are in compliance for 12 months with any service quality standard the Commission should consider an exemption for that specific standard because they are clearly meeting the customer's expectation of safe and adequate service for that standard. In a competitive environment the provider will continue meeting safe and adequate standards, even after an exemption is granted, in order to ensure the customer's loyalty.

DATED this 21st day of April, 2005.

Submitted by:



Qwest Corporation, and on behalf of:
Centurytel
Sprint Corporation
Verizon Northwest, Inc.

CERTIFICATE OF SERVICE

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I hereby certify that on the 21st day of April 2005, I served the foregoing **OPENING COMMENTS** in the above entitled docket on the following persons via electronic transmission, to their e-mail address listed below.

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DATED this 21st day of April, 2005.

QWEST CORPORATION

A handwritten signature in blue ink that reads "Ron L. Trullinger". The signature is written in a cursive style.

By: _____
RON TRULLINGER – Qwest Corporation