

Qwest Corporation 1600 7th Avenue, Room 3206 Seattle, Washington 98191 (206) 345-1568

Mark S. Reynolds Assistant Vice President Public Policy & Regulatory Affairs

February 26, 2009

Diane Davis Oregon Public Utility Commission P. O. Box 2148 Salem, OR 97308-2148

RE: Docket AR 533 – In the Matter of Clarifying OAR 860-032-0620, Quarterly OUS Report: Filing and Payment

Dear Ms. Davis,

As requested in the Notice of Proposed Rulemaking Hearing in Docket AR 533, filed on February 5, 2009, Qwest hereby files its comments in this matter. Qwest limits its comments in the matter to the following proposed amended language in OAR 860-032-0620 (1):

"The contribution report must include the signature of an <u>officer of the company</u> (telecommunication provider) verifying the information in the contribution report."

Qwest requests that this proposed amended language be changed to require the signature of an <u>authorized company employee</u> rather than that of an officer of the company. Requiring the signature of an officer, rather than an authorized company employee, adds an administrative burden to Qwest by requiring the transport of the documents to and from its headquarters location and at least two additional levels of review prior to officer signature. Qwest understands that the purpose for the proposed change is to ensure the accountability of the company for the report being filed. Qwest believes that such accountability can be achieved by requiring that an authorized employee of the company sign the report.

Qwest appreciates this opportunity to file written comments on the draft amendments to these rules. If you have questions concerning this filing, please contact Mark Reynolds at 206-345-1568.

Sincerely,

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