

**BEFORE THE PUBLIC UTILITY COMMISSION
OF OREGON**

ARB 641

In the Matter of)	
)	
QWEST CORPORATION)	STAFF COMMENTS
)	
Special Promotion Submitted for)	
Commission Acknowledgement Pursuant)	
to OAR 860-016-0021.)	

RECOMMENDATION: ACKNOWLEDGE PROMOTION

On November 18, 2004, Qwest Corporation (Qwest) filed a wholesale collocation promotion for acknowledgement by the Public Utility Commission of Oregon (Commission). The promotion will be used for future amendments to interconnection agreements previously approved by the Public Utility Commission of Oregon. Qwest seeks acknowledgement of the collocation promotion under OAR 860-016-0021. Any amendments filed using this promotion will be filed under Section 252(e) of the Telecommunications Act of 1996. The Commission provided notice by posting an electronic copy of the amendment on the World Wide Web, at: <http://www.puc.state.or.us/caragmnt/>. Under OAR 860-016-0021, comments are due ten days after the promotion is filed. The Commission Staff (Staff) offers these comments.

Staff recommends the Commission acknowledge the promotion. Staff concludes that the promotion, if filed as an amendment to an interconnection agreement, would not be rejected under OAR 860-016-0020(6). Qwest filed the information required by OAR 860-016-0021(1). The promotion does not appear to discriminate against telecommunications carriers who would not be parties to an amendment filed under the promotion and does not appear to be inconsistent with the public interest, convenience, and necessity.

If a carrier accepts the promotional offering, the parties are required to file an amendment to an existing carrier-to-carrier agreement. The amendment is subject to Commission approval pursuant to the standards set forth in OAR 860-016-0020 and Section 252(e) of the Telecommunications Act of 1996. Staff concludes that an amendment identical to this promotion, that is timely filed under OAR 860-016-0021(5), should be approved.

Dated at Salem, this 29th day of November, 2004.

Celeste Hari
Telecommunications Analyst