

Qwest 421 Southwest Oak Street Suite 810 Portland, Oregon 97204 Telephone: 503-242-5420 Facsimile: 503-242-8589 e-mail: carla.butler@qwest.com

Carla Butler Sr. Paralegal

May 20, 2005

Frances Nichols Anglin Oregon Public Utility Commission 550 Capitol St., NE Suite 215 Salem, OR 97301

Re: AR 492

Dear Ms. Nichols Anglin:

Enclosed for filing please find an original and (5) copies of Reply Comments for the above entitled docket, filed by Qwest on behalf of large companies of Oregon consisting of Qwest Corporation, Centrytel, Sprint, and Verizon Northwest, Inc., along with a certificate of service.

If you have any question, please do not hesitate to give me a call.

Sincerely,

Carla M. Butler

CMB: Enclosure cc: Service List (via e-mail) L:\Oregon\Executive\Duarte\AR 492\AR 492 Transmittal Ltr Large Cos (5-20-05).doc

BEFORE THE PUBLIC UTILITY COMMISSION

OF OREGON

AR 492

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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 Proving Retail Telecommunications Services

REPLY 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 reply comments regarding the

rules proposed in AR 492, Section 16 (d).

1. General Comments

The Large Companies have received Staff's Reply Comments dated May 17, 2005. Staff has responded that they do not support the Large Companies position relating to service quality reporting exemptions. The Large Companies request that the Commission still consider their initial comments. The Large Companies believe that if they are in compliance for 12 months with <u>any</u> service quality standard the Commission should consider an exemption for that specific standard. This is the only fair way to establish the new exemption language.

DATED this 20th day of May, 2005.

Submitted by:

Row L Trullinger

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

CERTIFICATE OF SERVICE

AR 492

I hereby certify that on the 20th day of May 2005, I served the foregoing **REPLY COMMENTS** in the above entitled docket on the following persons via electronic transmission, to their e-mail address listed below.

Ater-Wynne Lisa Rackner <u>lfr@aterwynne.com</u>	ATL Communications Aelea Christofferson <u>aelea@atlc.com</u>	AT&T of the PNW Letty S. D. Freisen <u>lsfriesen@att.com</u>
Cascade Steve Crosby <u>crosbys@cuaccess.net</u>	CenturyTel Doug Cooley Doug.Cooley@centurytel.com	Comcast Daniel Lanciano, Daniel_Lanciano@cable.comcast.c om
Comcast Rhonda Weaver <u>rhonda_weaver@cable.comcast.c</u> om	CUB Jeff Bissonnette jbissonnette@igc.org	Davis Wright Tremaine Mark Trinchero <u>marktrinchero@dwt.com</u>
Ernest Communications Paul Masters pmasters@ernestgroup.com	Eschelon Catherine A. Murray <u>camurray@eschelon.com</u>	Frontier (Citizens) & E.L.I. Charles Best <u>cbest@eli.net</u>
Frontier (Citizens) & E.L.I Ingo Henningson ingo.henningsen@czn.com	Frontier (Citizens) & E.L.I Ingo Henningson ingo.henningsen@czn.com	Global Crossing Teresa Reff <u>Teresa.Reff@globalcrossing.com</u>
Granite Communications: N.M. MacLeod-Hunter, nmhunter@granitenet.com	IGC: Jeff Bissonnette, jbissonnette@igc.org	Integra Telecom Steve Anderson <u>steve.anderson@integratelecom.co</u> <u>m</u> Karen Johnson <u>karen.johnson@integratelecom.com</u> Greg Scott <u>greg.scott@integratelecom.com</u> Rob Smith <u>rob.smith@integratelecom.com</u>
Malheur Home Telephone Jimmy Todd, <u>Jimmy.Todd@qwest.com</u>	MCI Matt Costello <u>Matt.Costello@mci.com</u> Michele Singer Nelson, <u>michel.singer_nelson@mci.com</u> Haleh Davary <u>Haleh.Davary@MCI.Com</u> Scott Benke <u>Scott.Benke@mci.com</u>	McLeodUSA: Haas, William A. whaas@mcleodusa.com

Mount Angel Telephone Carol Treager <u>clt@mtangel.net</u>	Nehalem Tel. & Tel Mike Crist <u>mikec@nehalemtel.net</u>	Oregon Public Utility Commission Lance Ball <u>lance.ball@state.or.us</u> Woody Birko <u>woody.birko@state.or.us</u> Rick Carter <u>rick.carter@state.or.us</u> Irv Emmons <u>irv.emmons@state.or.us</u> Phil Nyegaard <u>phil.nyegaard@state.or.us</u>
Oregon Telephone Corporation Gary Miller otc@ortelco.net	Oregon Telecom Dennis Gabriel <u>dgabriel@oregontelecom.com</u> Oregon Telecom Dave Gahlsdorf <u>dgahlsdorf@oregontelecom.com</u>	OTA Brant Wolf <u>bwolf@ota-telecom.org</u>
Qwest Communications Don K. Mason, <u>Don.Mason@qwest.com</u> Ron Trullinger <u>ron.trullinger@qwest.com</u>	Rio Communications Todd Way tway@rio.com	Rural Network Karen J. Ellison, <u>Karen@ruralnetwork.net</u>
Peoples' Telephone Co. Don Lawrence, <u>donl@sctcweb.com</u>	Sprint/United Glenn Harris <u>Glenn.Harris@mail.sprint.com</u>	TDS Telecom Gail Long gail.long@tdstelecom.com
TelWest Communications Donald O.Taylor, <u>dtaylor@telwestservices.com</u>	Time Warner Telecom Brian Thomas, <u>brian.thomas@twtelecom.com</u>	UniCom Michael E. Daughtry <u>mike@uci.net</u>
Verizon Northwest Renee Willer <u>renee.willer@verizon.com</u>	WanTel, d/b/a, CommSpanUSA Marty Patrovsky marty.patrovsky@comspanusa.net	XO Oregon David LaFrance <u>david.lafrance@xo.com</u>

DATED this 20th day of May, 2005.

QWEST CORPORATION

Trullingen Roul By: _

RON TRULLINGER – Qwest Corporation