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September 28, 2006

BY EMAIL AND U.S. MAIL

PUC Filing Center
Oregon Public Utility Commission
P.O. Box 2148
Salem, OR 97308-2148

Re: Docket AR 510

Enclosed for filing is the original of the Initial Comments of Qwest Corporation, which were also filed electronically.

Please add the undersigned to the service list for Qwest.

Sincerely yours,

Lawrence Reichman

Enclosure

cc: Service List

[13141-0061/PA062710.070]

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Perkins Coie LLP and Affiliates

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

AR 510

In the Matter of

Rulemaking to Amend Rules in OAR 860,
Division 028 Relating to Sanctions for
Attachments to Utility Poles and Facilities

INITIAL COMMENTS OF QWEST
CORPORATION

I. INTRODUCTION AND SUMMARY

Qwest Corporation ("Qwest") respectfully submits these initial comments pursuant to the schedule adopted by the Commission for this proceeding. Consistent with Chairman Beyer's letter to participants dated September 15, 2006, these comments address the OJUA proposal dated September 12, 2006.

Qwest appreciates the OJUA's efforts in proposing revisions to the pole attachment sanctions rules and thinks that most of the OJUA's proposals would improve the current rules. However, Qwest generally opposes the OJUA's proposal because it maintains the current system under which the Commission's rules authorize pole owners to impose and collect penalties. Qwest believes that the imposition of penalties by pole owners is unlawful, and that any rules that authorize such penalties exceed the Commission's statutory authority and violate several constitutional principles. Any penalties provided by Commission rule must be recovered in court and in the name of the State of Oregon. The only payments that may lawfully be collected by pole owners for violation of the Commission's rules or the terms of a pole attachment agreement are those that are compensatory in nature.

Without waiving these positions, if the Commission is to continue to allow pole owners to impose penalties, then the Commission must provide for additional procedural safeguards to protect the rights of parties from whom pole owners are seeking penalties. Thus, if the Commission continues to have rules that authorize pole owners to recover penalties, the Commission should provide that pole owners must seek such penalties in court actions. If the Commission does not adopt this approach, then it must take a more active role in the imposition of such penalties, and must provide parties with procedural protections that are not available under the current rules or OJUA's proposed revisions.

II. THE COMMISSION'S RULES MAY NOT AUTHORIZE POLE OWNERS TO IMPOSE PENALTIES

As the Commission is aware, Qwest believes that the Commission's rules authorizing pole owners to impose sanctions on pole occupants are illegal and unenforceable. Qwest is currently challenging those rules in court. *Qwest Corporation v. Public Utility Commission*, 205 Or. App. 370, 135 P.3d 321 (2006). The Court of Appeals ruled against Qwest, but Qwest is currently seeking review of that decision by the Oregon Supreme Court.

Qwest will not repeat the arguments that it and other parties have made before the court, but will set them forth here in summary fashion. Qwest believes that the Commission's rules authorizing pole owners to impose penalties on pole occupants exceed the statutory authority of the Commission. As a general matter, any penalty imposed under a statute administered by the Commission must be sought in an action brought in Circuit Court in the name of the State of Oregon. ORS 756.160(4). The Commission's penalty rules violate ORS 756.160(4) because they authorize penalties to be paid to parties other than the State of Oregon and to be imposed outside of a court proceeding.

As the Commission knows, the legislature has not given the Commission general power to impose penalties. The Commission may not delegate a power that it does not have and, thus, does not have general power to authorize pole owners to impose penalties. Moreover, Oregon

Laws 1999, chapter 832, section 9(3), *compiled as a note after* ORS 757.290, which required the PUC to promulgate rules "establishing appropriate sanctions for unauthorized attachments," does not delegate authority to the PUC to issue the penalty rules, particularly in view of the general limitations on the PUC's penalty power. Qwest believes that the only reasonable interpretation of that language is that the legislature required the Commission to establish the level of penalties for unauthorized attachments that it could seek to recover in a court action in the name of the State. *See* ORS 757.290 ("The procedures of the Public Utility Commission for petition, regulation and enforcement relative to attachments, including any rights of appeal from any decision thereof, shall be the same as those otherwise generally applicable to the commission.") Qwest also thinks that the legislature's reference to "unauthorized attachments" covers only attachments made without a permit and does not cover attachments made without a contract, safety violations, or breaches of contract.

The penalty rules also exceed the PUC's statutory authority because the penalties are not "just, fair, and reasonable" as required by ORS 757.273 and 757.276. The penalty rules authorize pole owners to impose penalties in a contractual relationship, including as a remedy for breach of contract. Such penalties are not just, fair, and reasonable because they violate the common law principle that penalties are not available as a remedy for breach of contract. *Secord v. Portland Shopping News*, 126 Or. 218, 223, 269 P. 228 (1928). The amount of the penalties also is not just, fair, and reasonable because they exceed an amount that is compensatory for breach of contract or other duty.

The Commission's delegation to private parties of the power to impose penalties, without retaining any right to control that function and without providing adequate procedural safeguards, also constitutes an unconstitutional delegation of governmental power. *Corvallis Lodge No. 1411 Loyal Order of Moose v. Oregon Liquor Control Commission*, 67 Or. App. 15, 677 P.2d 76 (1984). The PUC's penalty rules delegate the fundamentally governmental power to impose penalties to interested private parties with no substantive role for the government in those

decisions and no procedural safeguards to make the government accountable for such decisions. The rules also violate the Due Process Clause of the Fourteenth Amendment to the United States Constitution (the "Due Process Clause") by allowing penalty decisions to be made by non-neutral decision-makers, pole owners that benefit from the imposition of penalties. Also, the amount of the penalties is so excessive as to violate the Due Process Clause and the excessive fines clause of the Oregon Constitution (Article I, Section 16).

The existing penalty rules also represent bad policy. Pole owners use the Commission's penalty rules as a source of windfall revenue. There are several recent cases in which pole owners have sought tens of millions of dollars in penalties in circumstances where there had been an agreement in place, the pole occupant had obtained permits for the vast majority of its attachments, and no material safety violations were shown. This sort of windfall revenue causes pole attachment rates to greatly exceed the cost-based rates that state and federal law are designed to require. Application of these penalties also threatens investment in new technology and ultimately leads to higher rates for consumers of communications services.

Because the Commission lacks the legal authority to issue rules authorizing pole owners to impose penalties, Qwest believes that the Commission should delete all provisions that authorize such penalties. While it may be appropriate for the government to impose penalties to punish bad conduct, it is inappropriate and illegal for private parties to recover penalties, particularly in the context of a contractual relationship. Should the Commission decline Qwest's request to delete the penalty rules in their entirety, the Commission should at least revise the rules to establish a more reasonable level of compensation for unauthorized attachments as well as procedural safeguards for the imposition of any charges. Qwest suggests that the Commission authorize pole owners to recover only compensatory relief, such as past due rent, and proposes language to accomplish that in the next section.

4- INITIAL COMMENTS OF QWEST CORPORATION

III. THE COMMISSION MAY AUTHORIZE POLE OWNERS TO RECOVER ONLY COMPENSATORY RELIEF

In the place of penalties, Qwest proposes that the Commission authorize pole owners to charge pole occupants what amounts to compensatory relief for violation of the Commission's rules regarding pole attachments. For attachments made without a permit, pole owners should be authorized to collect the equivalent of unpaid rental charges, as the FCC has permitted in establishing "just and reasonable" terms and conditions. *In the Matter of Mile Hi Cable Partners, L.P. et al v. Public Service Company of Colorado*, 17 FCC Rcd 6268, ¶ 11 (rel. March 28, 2002), *rev den*, 328 F3d 675 (DC Cir 2003). The Commission should authorize pole owners to charge only unpaid rent for unauthorized attachments back to the date the attachment was made. If that date is unknown, pole owners should be allowed to charge rent back to the last actual audit, but in all cases only up to a maximum of five years. A rule authorizing such charges by pole owners, in lieu of unlawful penalties, would be consistent with FCC precedent and establish good policy.

To accomplish this, Qwest proposes the following new rule:

860-028-xxxx Recovery of Rental Charges for Having No Permit

(1) If a pole occupant installs an attachment on a pole without obtaining a permit as required by OAR 860-028-0120(1)(b), the pole owner may charge the pole occupant past-due rent measured as follows:

(a) Rental charges shall be in the per-foot amounts set forth in the parties' agreement or, if they do not have an agreement, calculated according to OAR 860-028-0110.

(b) Such rental charges shall apply from the date the pole owner issues a notice of unauthorized attachment back to the date the pole occupant made the unauthorized attachment. In the event neither party can establish the date the pole occupant made the unauthorized attachment, the pole owner shall be entitled to recover rent back to the date of its last audit covering the territory in which the pole is found. In no event may a pole owner charge a pole occupant for past-due rent for an attachment for a period exceeding five years.

Pole owners are also allowed to recover expenses incurred as a result of unauthorized attachments or attachments that violate the Commission's safety rules. ORS 757.271(2). The Commission does not need to issue rules to this effect, since that is already provided in a statute.

IV. IF THE COMMISSION INSISTS ON ESTABLISHING PENALTIES, IT SHOULD ALSO PROVIDE APPROPRIATE PROCEDURES FOR THEIR RECOVERY

Qwest believes that the most the Commission may lawfully do is prescribe the level of penalties that the Commission may seek to recover in an appropriate court action. Thus, the penalty rules should simply establish the level of penalties, but should not authorize pole owners to impose them. Qwest makes the following comments without waiver of its principal objections to the penalty rules discussed above.

If the Commission insists on continuing to authorize pole owners to recover penalties, then the Commission must establish procedures for their recovery that provide adequate procedural safeguards to the parties from whom penalties will be sought. Penalty claims may be very large – pole owners have filed claims seeking tens of millions of dollars in penalties. Given the large amounts of money at issue, Qwest believes that pole owners should be required to seek penalties in court, so that the parties from whom penalties are sought may have available the full panoply of procedural rights that are designed to ensure fair results.

In Qwest's court challenge to the penalty rules, the Commission argued that resort to the Commission's complaint proceedings under ORS 756.500 *et seq.* provides adequate procedural safeguards to a party facing the imposition of penalties by a pole owner. In affirming the rules, the court seemed to be under the impression that those procedures are available, and the court found that important. *Qwest Corporation*, 205 Or. App. at 382-85. These procedures, however, are not expressly available under the Commission's rules, and Qwest believes that the court erred in this part of its decision. Qwest does not think that the Commission may issue orders imposing penalties because the Commission lacks the statutory authority to do so; however, it is preferable for the Commission to make such orders than for pole owners to impose penalties themselves. It

is also preferable for the Commission to afford parties with an adequate opportunity to be heard, by holding a hearing that involves the presentation of evidence and cross-examination of witnesses, than to continue to permit the abbreviated proceeding allowed by OAR 860-028-0220. Thus, at the minimum, if the Commission does not require pole owners to file court actions, the Commission should require pole owners to seek penalties by filing a complaint pursuant to ORS 756.500, and should make available all of the procedures that typically apply to such proceedings.

V. COMMENTS ON SPECIFIC RULE PROPOSALS

In addition to its general comments and suggestions set forth above, Qwest has the following comments on some of OJUA's specific rule proposals. Once again, these comments are made without waiving Qwest's general objections to the penalty rules discussed above.

A. OAR 860-028-0130

Qwest applauds OJUA's proposal for subsection (2) that would eliminate "no contract" penalties where the parties are negotiating the replacement for a recently expired or terminated contract. This proposal addresses a significant problem in the existing rules where pole owners have threatened to terminate, and actually have terminated, existing pole attachment agreements in order to gain an advantage in the negotiation of replacement agreements.

On the other hand, Qwest thinks that OJUA's proposal to eliminate the ability to impose a penalty lower than \$500 per pole, and its proposal to eliminate the ability to cure a violation and, thus, reduce the penalty, are steps in the wrong direction. There is no reason to require the maximum penalty in every case, and providing the opportunity to cure what might be an inadvertent mistake to reduce the penalty is only fair.

B. OAR 860-028-0140

OJUA's proposal for a penalty of five times annual rent, instead of 30 times, is a step in the right direction. However, as proposed above, Qwest firmly believes that any payment to a pole owner for an attachment made without a permit should attempt to approximate past-due

rent. Qwest also does not think that an additional \$100 per pole penalty is justified where the pole owner happens to identify a violation. Finally, this rule should provide an opportunity to cure the violation to reduce any penalty (not required if the payment is limited to past-due rent).

C. OAR 860-028-0150

As discussed above, Oregon courts do not allow penalties as a remedy for breach of a contract, and neither should the Commission's rules. In addition, ORS 757.271(2) limits pole owners to recovering expenses incurred as a result of safety violations. This rule should simply be eliminated.

Qwest does appreciate the cure provision OJUA proposed as new subsection (2). Qwest also thinks that the penalty should not be fixed at a per-pole amount, but that the decision-maker should have the ability to adjust the level of the penalty up to a maximum amount.

D. OAR 860-028-0180

Qwest thinks that the OJUA's proposal to delete the existing provisions, which allow a dramatic and rapid increase in the amount of penalties, is a very good suggestion.

E. OAR 860-028-0220

The OJUA does not propose any revisions to this rule. Qwest thinks that the existing rule has too limited a scope (resolution of factual issues only) and provides inadequate procedural safeguards (submission of only written comments, but no evidence and no hearing). Qwest addresses the more appropriate procedures above.

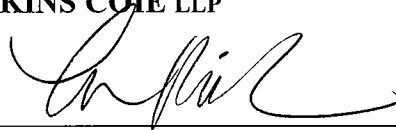
VI. CONCLUSION

For the foregoing reasons, Qwest urges the Commission to revise the penalty rules so that pole owners are not authorized to impose penalties and to make other revisions consistent with Qwest's comments herein.

DATED: September 28, 2006.

PERKINS COIE LLP

By



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CERTIFICATE OF SERVICE
AR 510

I hereby certify that on this day I served the foregoing **INITIAL COMMENTS OF QWEST CORPORATION** on the following persons by causing a copy to be sent by electronic mail and by U.S. Mail, contained in a sealed envelope, with postage prepaid, addressed to said persons at the following addresses and deposited in the post office at Portland, Oregon on this day:

SEE ATTACHED SERVICE LIST

DATED: September 28, 2006

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