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Carla M. Butler
Lead Paralegal

July 28, 2006

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

Re: UX-29

Dear Ms. Nichols Anglin:

Enclosed for filing in the above entitled matter please find an original and (5) copies of Qwest Corporation's Qwest's Petition For an Extension of Time to Comply With Order No. 06-399, and Request for Expedited Consideration, along with a certificate of service.

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

Sincerely,

A handwritten signature in black ink that reads "Carla". The signature is written in a cursive, flowing style.

Carla M. Butler

CMB:
Enclosures
cc: Service List

BEFORE THE PUBLIC UTILITY COMMISSION OF OREGON

UX 29

In the Matter of the Petition of Qwest
Corporation to Exempt from Regulation
Qwest's Switched Business Services

QWEST'S PETITION FOR AN
EXTENSION OF TIME TO COMPLY
WITH ORDER NO. 06-399, AND
REQUEST FOR EXPEDITED
CONSIDERATION

Pursuant to OAR 860-014-0093, Qwest Corporation ("Qwest") respectfully petitions the Commission for an extension of the time to comply with the Commission's recent Order No. 06-399 (dated July 12, 2006) until February 28, 2007. The general basis for this petition is two-fold.

First, although Qwest is able to file the appropriate revisions to its tariffs and price lists to conform with Order No. 06-399 within 30 days of the date of the order, Qwest is unable to implement the appropriate changes to its other systems, including customer records, billing and accounting, within such a short period of time. Second, Qwest intends to file a motion for reconsideration within the 60-day period of ORS 756.561 and OAR 860-014-0095. Qwest believes that the Commission should first consider any motion for reconsideration before Qwest is required to implement the requirements in Order No. 06-399, as those requirements could change. Thus, for the reasons set forth below, Qwest believes and respectfully requests that the Commission should extend Qwest's time to comply with the Order until February 28, 2007.

Finally, because of the fast-approaching August 11, 2006 implementation date (30 days after July 12, 2006), Qwest respectfully requests expedited consideration of this petition. Qwest advised the other parties in this docket, including Staff, of this petition the morning of July 27, 2006, and as of the filing of this petition, no party had expressed any objections. In fact, Staff and the intervening CLECs specifically and affirmatively indicated they had no objections.¹

¹ Qwest left a substantive voicemail message for TRACER's attorney the morning of July 27, 2006 asking whether TRACER had any objections. As of the filing of this petition, Qwest had not heard back from TRACER.

PERTINENT BACKGROUND

On July 12, 2006, the Commission issued its order in response to Qwest's June 2004 petition to deregulate Qwest's switched business services under ORS 759.052 (formerly ORS 759.030). See Order No. 06-399 (issued July 12, 2006) (hereafter "the Order"). In the Order, the Commission granted in part and denied in part Qwest's petition. Specifically, the Commission granted Qwest's petition with respect to Qwest's 800 Service/OutWATS service, its Frame Relay service and its Asynchronous Transfer Mode (ATM) service, in all rate centers in Oregon (i.e., statewide), pursuant to ORS 759.052(1). See Order, pp. 3, 20. The Commission also granted Qwest's petition with respect to its basic business service and associated features (both digital and analog, and for both flat-rated (1FB) and measured service), but only for customers with four lines or more, and only for such four-line and greater customers in the Portland and Clackamas rate centers. *Id.*, pp. 3, 19. The Commission denied Qwest's petition for all other services. *Id.*, pp. 3, 19, 20. Finally, the Commission ruled that Qwest "shall file such revisions to its tariffs and price lists as shall be necessary to conform with the terms of th[e] Order within 30 days of the date of th[e] Order." *Id.*, p. 21. The date of implementation therefore would be August 11, 2006.

ARGUMENT

OAR 860-014-0093(1) provides that a party may file a petition for an extension of an effective date or of the time to comply with a Commission rule or Commission order. OAR 860-014-0093(2) requires the petition to set forth specifically the reasons for the requested extension.

I. QWEST CANNOT IMPLEMENT APPROPRIATE CHANGES TO ITS BILLING AND OTHER SYSTEMS WITHIN A SHORT 30-DAY PERIOD OF TIME

First, Qwest respectfully requests an extension of the time to comply with the Order because it simply cannot, from a billing and other systems standpoint, comply with the requirements of the Order within 30 days. Specifically, there is much billing and other systems

work that Qwest must perform in order to implement the Order. For example, the Order requires deregulation of basic business services only within certain geographic areas, and only for customers who have four or more lines. Qwest's systems are not currently structured to provide for this type of differentiation, and thus Qwest must analyze and complete a review of alternative methods of implementation. Such an implementation will likely require a number of detailed IT (information technology) changes to its CRIS (Customer Record and Information System) billing system, as well as to other customer record and accounting systems.

Once this analysis work is completed, the actual implementation work effort must be completed, tested and eventually integrated into the live billing system. This process requires minimum of at least two to three months to accomplish the work needed. Moreover, changes such as these are only completed in conjunction with specific "release dates" for such IT changes to the CRIS billing system. The next release date, however, is not until October 12, 2006, and the one after that is December 7, 2006. Thus, Qwest cannot comply with the Order within 30 days of the Order (August 11, 2006).

In addition, as stated, Qwest intends to file a motion for reconsideration file next month (as discussed below). This would entail at least a 60-day time period for the Commission to rule (approximately late October). Thus, even a December 7, 2006 CRIS IT release date would be very difficult to implement. The next CRIS IT release after December 7th is February 15, 2007.

Finally, Qwest's experience with other recent deregulation orders has been that such implementation work has taken many months to complete. This was certainly the case with Qwest's implementation of the Commission's deregulation of Complete-a-Call in docket UX 27 and intraLATA toll and 800 ServiceLine Option services in docket UX 28 from 2003 to 2005.

Accordingly, given that the earliest that Qwest could implement any of the requirements of the Order in its billing systems is December 7, 2006, and that Qwest may not even be able to

achieve a December 7, 2006 date because of Qwest's motion for reconsideration, Qwest respectfully requests that the Commission extend Qwest's time to comply with Order until February 28, 2007 (the end of the month of the CRIS IT release on February 15, 2007).

II. THE COMMISSION SHOULD EXTEND THE TIME TO COMPLY WITH THE ORDER UNTIL AFTER IT HAS RESOLVED THE ISSUES TO BE RAISED IN QWEST'S MOTION FOR RECONSIDERATION

As stated, Qwest intends to file a motion for reconsideration next month. Thus, it is very unlikely that the issues to be addressed in that motion for reconsideration will be decided until some time in late October (since the Commission has 60 days under OAR 860-014-0095 to rule on a motion for reconsideration). Qwest does not believe that the Commission should require Qwest to implement the Order until the issues raised in the motion for reconsideration have been resolved. Moreover, there is no harm or prejudice to the Commission, or to any party, or to any Qwest customer, because the granting of an extension would simply keep the status quo ante.

CONCLUSION

Accordingly, Qwest respectfully requests that the Commission grant an extension of the time to comply with the Commission's recent Order No. 06-399 until February 28, 2007.

DATED: July 28, 2006

Respectfully submitted,
QWEST



By: _____
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Attorney for Qwest Corporation

CERTIFICATE OF SERVICE

UX-29

I hereby certify that on the 28th day of July, 2006, I served the foregoing **QWEST CORPORATION'S PETITION FOR AN EXTENSION OF TIME TO COMPLY WITH ORDER NO. 06-399, AND REQUEST FOR EXPEDITED CONSIDERATION** in the above entitled docket on the following persons via U.S. Mail (or via e-mail if so indicated), by mailing a correct copy to them in a sealed envelope, with postage prepaid, addressed to them at their regular office address shown below, and deposited in the U.S. post office at Portland, Oregon.

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DATED this 28th day of July, 2006.

QWEST CORPORATION



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