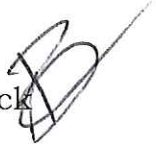



**OREGON PUBLIC UTILITY COMMISSION
INTEROFFICE CORRESPONDENCE**

DATE: September 17, 2015

TO: File through Bruce Hellebuyck 

FROM: Jim Stanage 

SUBJECT: Qwest Corporation, Transmittal No. 2015-007-PL
Grandfathers Smart Public Access Line Service.

I have reviewed this filing and recommend that an acknowledgement letter be sent. The filing went into effect on August 19, 2015, and was filed on August 18, 2015. The company proposes to grandfather its Smart Public Access Line (PAL) Service.

Smart PAL service can be described as a “dumb” (basic, no frills) phone using a “smart” (extra features, screening) line. By contrast, a basic PAL service can be described as a “smart” phone using a “dumb” (basic, no frills) line.

Smart PAL provides network-controlled payphone features to the PAL phone via the Qwest switched network. Smart PAL provides the PAL customer coin control, ability to set usage rates to the end-user for local calls, and low per minute rates for intraLATA sent paid (1+) calls.

The grandfathered service would no longer be offered to new customers, although current customers may retain it as long as they remain at the same service location. The company states, however, that it has no current customers for Smart PAL. Nevertheless, counsel has advised staff that this filing complies with Oregon law.

This filing would not change the rates, terms, or service conditions for the services affected by the grandfathering. No sunset date is proposed in this filing for the grandfathered service, and therefore, this filing does not constitute an abandonment of service under OAR 860-032-0020(15).

Qwest estimates that the filing will have a negligible effect on annual revenues.