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Qwest
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2008 FEB 22 P 4: 06
AZ CORP COMMISSION
DOCKET CONTROL

Kathy Rowley
Staff Paralegal-Interrogatory Manager

February 22, 2008

VIA OVERNIGHT DELIVERY AND/OR HAND DELIVERY

Armando Fimbres
Public Analyst , Utilities Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007
Phone: 602-542-3402

Re: Staff's Letter of Insufficiency ("QCC")
Docket No. T-02811B-08-0029

Dear Mr. Fimbres:

Enclosed are Qwest's Responses to Staff Set1, Nos. 001-016, in the above-referenced docket. Some of the information being provided is "Confidential" and Qwest requests that it be treated as such. Should you have any questions regarding the attached, you may contact me at (303) 383-6679.

Sincerely,

Kathy Rowley

Enclosures

cc: Norman Curtright, Esq.
Docket Control: ACC - Redacted Version

Arizona Corporation Commission

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Arizona
Docket No. T-02811B-08-0029
STF 01-001

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 001

Please confirm that this filing seeks to increase the Maximum Monthly Rate per Line rate rather than Maximum Monthly Rate per Account as stated in the cover page of the tariff filing.

RESPONSE:

Yes, the filing seeks to increase the maximum monthly rate per line rather than the maximum monthly rate per account as stated in the cover page of the tariff filing.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-002

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 002

Please provide a statement setting forth the reasons for which a rate increase is required. Refer to R14-2-1 1 10(B)(1) of the Arizona Administrative Code ("AAC").

RESPONSE:

The proposed increases will present a revenue increase to the company from interstate services. The new rates requested by Qwest are just and reasonable in a competitive market such as the residential direct dialed long distance market. According to the Commission's own website, there are 273 certificated long distance carriers in the state of Arizona.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-003

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 003

A decision has not been reached by the Commission in Generic Docket, Docket No. RT-00000J-05-0329, In the Matter of the Generic Investigation of Tariffing and Notice Requirements for Combined Interstate and Intrastate Calling Plans. Does QCC agree, therefore, that Commission rules for maximum rate increases apply in this matter? If no, please explain QCC's position.

RESPONSE:

Qwest's 1/14/08 filing in this matter states that it was filed pursuant to the Commission's rules for increasing maximum rates, i.e. R14-2-1110.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-004

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 004

Please indicate if there is a cost based justification for the rate increase (i.e., is the rate increase necessary to account for a change in your cost)? If yes, please describe the change in your costs. Provide calculations and data to support your cost justification.

RESPONSE:

The proposed rate increase is not the result of a change in the cost of the interstate service.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-005

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 005

How many customers were mailed the Exhibit 1 customer notice included with the January 14, 2008 application?

RESPONSE:

See Confidential Attachment A.

Respondent: Sharon Alvarado

Redacted

Arizona
Docket No. T-02811B-08-0029
STF 01-006

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 006

Did Qwest receive any written responses from customers regarding the Exhibit 1 customer notice? If yes, please provide copies of all written responses.

RESPONSE:

Qwest is not aware of any written responses from customers.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-007

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 007

The following pages are related to this filing:

- Tariff No. 2, Section 103, Page 2, Release 2, T-0281 1B-05-0234, amended 4/5/05
- Tariff No. 2, Section 103, Page 22, Release 2, T-0281 1B-07-0029
- Tariff No. 2, Section 103, Page 22, Release 3, T-0281 1B-08-0029

Similar pages for Qwest LD Corp. are as follows:

- Tariff No. 2, Section 103, Page 12, Release 2, T-04190A-05-0233, amended 4/5/05
- Tariff No. 2, Section 103, Page 12, Release 3, T-04190A -07-0030
- Tariff No. 2, Section 103, Page 12, Release 4, T-04190A -08-0030

Is the page and release number sequencing for tariffs T-02811B-05-0234, T-0281 1B-07-0029 and T-02811B-08-00029 correct? I.E., are the page numbers 2 and 22 correct, and should the release sequence be 2, 2, and 3? If no, please explain and provide corrected pages corresponding to this tariff.

RESPONSE:

For QCC Tariff No.2, section 103, Page 22, Release 3, is part of this filing (08-0029). Tariff No. 2, section 103, Page 2, Release 2 is part of the 2007 filing (07-0029) which is still pending.

For QLDC, Tariff No. 2, section 103, Page 12, Release 4 is part of this filing (08-0030). Tariff No. 2, section 103, Page 12, Release 3 is part of the 2007 filing (07-0030) which is still pending.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-008

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 008

Does the number of customers impacted by this filing still equal the figure provided to Staff via email on January 22, 2008? If yes, please indicate if the figure must be treated as Confidential. If no, please provide the appropriate information and indicate if the figure must be treated as Confidential.

RESPONSE:

Yes, the number of customers impacted by this filing still equals the figure provided to Staff via email on January 22, 2008 and should be treated as confidential. See Confidential Attachment A for the December 2007 number of QCC customers for the affected plan.

Respondent: Sharon Alvarado

Arizona QCC Maximum Rate Increase Filing:

Redacted

Confidential Use Only – Disclose and distribute only to Qwest employees having a legitimate business need to know. Disclosure outside of Qwest is prohibited without authorization.

CONFIDENTIAL

Arizona
Docket No. T-02811B-08-0029
STF 01-009

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 009

What is the number of lines corresponding to the number of customers in the above response? Also, please indicate if the figure must be treated as Confidential.

RESPONSE:

The QCC billing system does not permit Qwest to distinguish customers separately from lines. However, for residential customers it is assumed that the line to customer ratio is 1. The data reported in STF 1-008, Confidential Attachment A, is the most current number of customers.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-010

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 010

Does the estimated annual revenue associated with this filing still equal the figure provided to Staff via email on January 22, 2008? If yes, please indicate if the figure must be treated as Confidential. If no, please provide the appropriate information and indicate if the figure must be treated as Confidential.

RESPONSE:

Yes, the estimated interstate annual revenue associated with this filing still equals the figure provided to staff via email on January 22, 2008. Please see STF 1-008, Confidential Attachment A, for the December 2007 estimated interstate revenue impact for the affected plan.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-011

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 011

Does the \$20 monthly cap referenced in the customer notice apply to each customer account or to each customer line?

RESPONSE:

The \$20 monthly cap applies to each line for which the customer has subscribed to the grandfathered Choice Long Distance calling plan.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-012

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 012

Please explain how many customers, on average, reached the \$20 monthly cap during 2007?

RESPONSE:

Qwest does not track the number of calls made by each customer and how many reached or didn't reach the cap every month.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-013

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 013

If the proposed increase is approved by the Commission, how many customers, on average, does QCC estimate will reach the \$20 monthly cap during 2008?

RESPONSE:

Qwest cannot estimate such a number since the Company does not track the number of calls made by each customer and how many reached or didn't reach the cap every month.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-014

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 014

How many customers and lines does QCC estimate will move to other QCC long distance programs as a result of the proposed rate increase? Please indicate if the information must be treated as confidential.

RESPONSE:

Qwest does not know how many customers might move to another QCC long distance plan.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-015

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 015

Does QCC believe customers will change to other long distance providers as a result of the proposed increase? If yes, please provide an estimate for the cost that individual customers might incur for moving to other long distance providers.

RESPONSE:

As mentioned in Qwest's response to request number 1.2, long distance is a competitive service and customers are able to pick and choose a carrier of their choice at anytime. Qwest does not know the prices of other providers and therefore does not know the cost that a customer might incur for moving to another long distance provider other than the charge by their local provider for a PIC change charge which is routinely reimbursed by the new carrier as an incentive for the customer to change providers.

Respondent: Sharon Alvarado

Arizona
Docket No. T-02811B-08-0029
STF 01-016

INTERVENOR: Arizona Corporation Commission Staff

REQUEST NO: 016

Please provide the estimated % increase in QCC intrastate revenues associated with this filing and explain if the % should be treated as Confidential.

RESPONSE:

This charge is an interstate charge that the Commission ordered to be filed in Qwest's intrastate tariffs as a result of Decision No. 67745. The entire revenue increase associated with this change will be booked as interstate revenue. Therefore there is no estimated % increase in QCC intrastate revenues.

Respondent: Sharon Alvarado