

Qwest Corporation
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JAN 20 2005

SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Larry Toll
President –South Dakota

January 18, 2005

Ms Pamela Bonrud
Executive Director
Public Utilities Commission
500 East Capitol Avenue
Pierre, South Dakota 57501

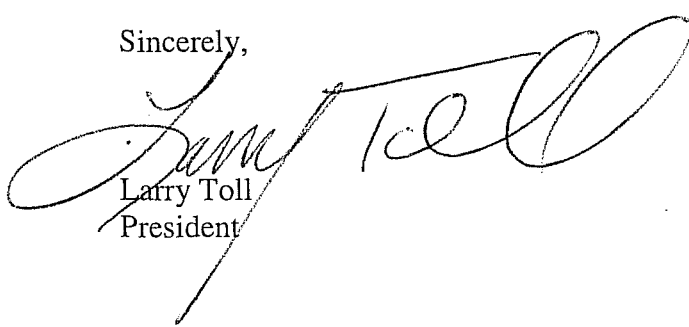
Dear Pam:

Last year you and I, along with other Staff members and my team, discussed the possibility of eliminating some of the reports that Qwest had been required to file with the Commission. As a result of that discussion we were able to identify some of the reports that Staff agreed would no longer be necessary. At that time I mentioned that we would possibly be asking for a waiver of the switched access cost study that is due in June of this year.

This letter, and the accompanying filing, is to formally request that the Commission grant Qwest Corporation a waiver of the switched access cost study required in ARSD20:10:27:07. The study requires a great deal of resources and is costly to produce. Although a new cost study is estimated to result in higher access rates than the one filed three years ago, Qwest Corporation does not intend to ask for an increase in access rates at this time. If Qwest would decide at a future date to seek an increase in the access rates, an updated cost study would be filed with the Commission, as required.

Should you wish to discuss this with me, please feel free to call me on 605-339-5411.

Sincerely,



Larry Toll
President

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

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SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

Qwest Corporation's Application for
Waiver of Switched Access Cost Study

TC - _____

Qwest Corporation ("Qwest") respectfully asks the Public Utilities Commission to grant it a waiver, under ARSD § 20:10:27:02, of the switched access cost study required by ARSD § 20:10:27:07.

ARSD § 20:10:27:07 requires a carrier's carrier to file cost data in support of its switched access service tariff no less than once every three years. ARSD § 20:10:27:02 provides that the Commission may, for good cause shown, either by its own motion or by application from a carrier's carrier, temporarily waive or suspend any rule in chapter 20:10:27.

Qwest requests a waiver of the cost study requirement because (1) producing such a study is costly and consumes a great deal of resources; and (2) Qwest does not intend to raise access rates at this time, although preliminary analysis indicates that a cost study would likely support higher rates than even those from the last study.

WHEREFORE, Qwest submits that it has provided the Commission with good cause and it respectfully asks the Commission to temporarily waive or suspend the requirement in ARSD § 20:10:27:07 for the current three-year study period.

RESPECTFULLY submitted this 17th day of January, 2005.

QWEST CORPORATION

By: Melissa K. Thompson
Melissa K. Thompson, Senior Attorney
Qwest Services Corporation
1801 California, 10th Floor
Denver, Colorado 80202
303-383-6643

CERTIFICATE OF SERVICE

This is to certify that a true and exact copy of the foregoing **Qwest Corporation's Application for Waiver of Switched Access Cost Study** was delivered via US Postal to the following on this 18th day of January, 2005:

Pamela Bonrud, Executive Director
South Dakota Public Utilities Commission
500 East Capitol
Pierre, SD 57501

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