

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF SOUTH DAKOTA

RECEIVED
SEP 12 2005
SOUTH DAKOTA PUBLIC
UTILITIES COMMISSION

IN THE MATTER OF THE REVIEW OF THE)
IMPLEMENTATION OF 811 AS A NATIONAL)
ABBREVIATED DIALING CODE FOR ONE)
CALL NOTIFICATION)

TC 05-153

Comments of
Qwest Corporation

COMMENTS OF QWEST CORPORATION

On August 10, 2005, the Public Utilities Commission opened the above-referenced docket and ordered interested parties to provide comments on whether or not new rules are needed to implement the Federal Communications Commission's ("FCC") report and order regarding the designation and implementation of 811, or whether the Commission should simply address the issues involving particular carriers as they arise.

The FCC released its Report and Order on March 14, 2005 (the "Order") designating "811" as the national abbreviated dialing code to be used by state One Call notification systems.¹ The Order implements the Pipeline Safety Improvement Act of 2002, which provides for the establishment of a nationwide toll-free abbreviated dialing arrangement to be used for providing advanced notice of excavation activities to underground facility operators.² In the Order, the FCC delegated authority to state commissions, pursuant to section 251(e) of the Telecommunications Act of 1996, to address technical and operational issues.³

The FCC's Order requires carriers to implement the use of "811" by April 13, 2007. The Order also requires discontinuing the use of existing abbreviated dialing sequences such as

¹Pipeline Safety Improvement Act of 2002, Pub. L. No. 107-355, § 17, 116 Stat. 2985, 3008 (2002) (the "Pipeline Safety Act").

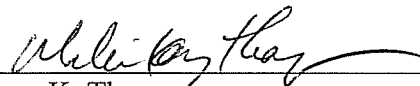
²*Id.*

wireless carriers' use of "344" ("DIG") and wireline carriers toll-free 8XX for "call before you dig" services. The Order directs that either the Numbering Plan Area (NPA)-NXX for wireline, or the originating switch for wireless, determine the appropriate "One Call Center" to which a call should be routed. Qwest has already begun the necessary work to begin implementing the use of 811 as the national abbreviated dialing pattern for access to State One Call Centers.

Qwest does not believe that it is necessary for the Commission to establish additional rules to ensure implementation of the FCC's 811 Order. To implement 811 dialing, carriers must perform translation work in their switches. Rather than establishing any kind of rulemaking to ensure that each carrier performs the necessary work, the Commission could simply require carriers to notify the Commission upon completion of modifications to their switches.

Respectfully submitted this 9th day of September, 2005.

QWEST CORPORATION

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing **Comments of Qwest Corporation** to be served via electronic and U.S. Mail, postage prepaid, to the following on this 9th day of September, 2005:

Pamela Bonrud, Executive Director
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