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Jason D. Topp
Corporate Counsel



December 15, 2006

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

**Re: In the Matter of the Filing for Approval of a Qwest Local
Services Platform Agreement between Qwest Corporation
and Granite Telecommunications L.L.C.
Docket No. TC06-171**

Dear Ms. Van Gerpen:

Enclosed for filing is Qwest Corporation's Request for Reconsideration regarding the above-referenced matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason D. Topp", written over a horizontal line.

Jason D. Topp

JDT/bardm

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of December, 2006, the original and 10 copies of the foregoing **QWEST CORPORATION'S REQUEST FOR RECONSIDERATION** were served upon the following party:

Patricia Van Gerpen
Executive Director
South Dakota Public Utilities Commission
500 East Capitol Avenue
Pierre, SD 57501

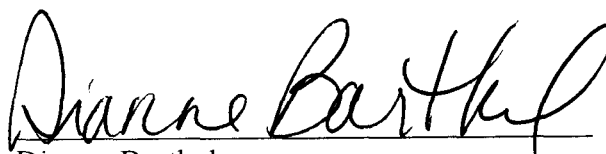
and copies sent electronically or via U.S. mail, addressed to the following:

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Dianne Barthel

**STATE OF SOUTH DAKOTA
BEFORE THE SOUTH DAKOTA PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF THE FILING
FOR APPROVAL OF A QWEST LOCAL
SERVICES PLATFORM AGREEMENT
BETWEEN QWEST CORPORATION AND
GRANITE TELECOMMUNICATIONS L.L.C.**

TC06-171

QWEST CORPORATION'S REQUEST FOR RECONSIDERATION

Qwest respectfully requests that the Commission reconsider two aspects of its November 17, 2006 order in this docket.

On October 11, 2006, Qwest provided a copy of an agreement with Granite Telecommunications LLC. On November 17, 2006, the Commission issued an order that states the "Commission received for approval a filing of [the agreement]," and concluded that the Commission had authority to approve the agreement pursuant to Section 252(e)(2) and approved the agreement.

The order is erroneous in that Qwest did not ask for Commission approval of the agreement. Qwest provided the copy so that the Commission could understand Qwest's analysis concluding that the agreement was not subject to Section 252 approval.

Qwest also asks the Commission to reconsider its authority to review and approve the agreement under state and federal law. Section 252 filing obligations apply only to services provided under Sections 251(b) and (c). This agreement does not relate to such services. Furthermore, while this Commission has previously ruled that Qwest Platform Plus (QPP) agreements, are subject to filing and approval requirements, this agreement does not contain

any of the criteria identified in that order as support for making such a ruling. The details of Qwest's position on this issue were set forth in my October 11, 2006 letter. Finally, no party filed comments disputing Qwest's analysis of this issue prior to the Commission's order.

Accordingly, Qwest respectfully requests that the Commission reconsider its November 17, 2006 order, clarify that Qwest did not seek approval of this agreement and affirm that this agreement is not subject to filing and approval requirements pursuant to state and federal law.

Dated this 15th day of December, 2006.

QWEST CORPORATION

By 

Jason D. Topp

Qwest Corporation

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