

Qwest Corporation
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George B. Thomson
Corporate Counsel

May 30, 2008

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

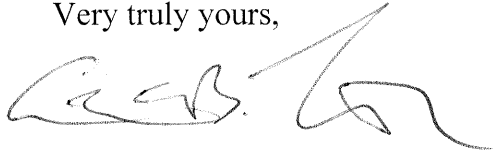
**Re: In the Matter of Qwest Corporation's Request of the South Dakota
Public Utilities Commission for 2008 ETC Certification to the Federal
Communications Commission for 2007 Federal Universal Service
Support Pursuant to § 20:10:32:52
Docket No. TC 08-**

Dear Ms. Van Gerpen:

Enclosed for filing are the following regarding the above-referenced matter:

1. Qwest Corporation's 2008 Annual ETC Certification Filing;
2. Affidavit of Larry Toll; and
3. Request for Confidential Treatment of Information.

Very truly yours,



George B. Thomson

Enclosures

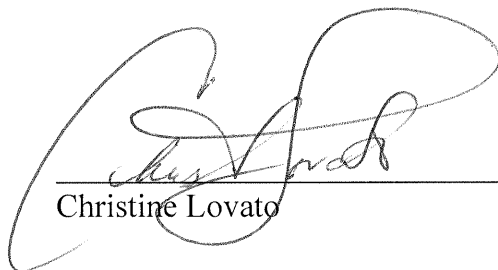
CERTIFICATE OF SERVICE

I hereby certify that on this 30th day of May, 2008, **Qwest Corporation's 2008 Annual ETC Certification Filing, Affidavit of Larry Toll, and Request for Confidential Treatment of Information** was e-Filed 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:

Colleen E. Sevold
Manager-Regulatory Affairs
Qwest Corporation
125 South Dakota Avenue, 8th Floor
Sioux Falls, SD 57194
colleen.sevold@qwest.com



Christine Lovato

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

| | | |
|---|---|---------------------------------|
| IN THE MATTER OF QWEST CORPORATION'S |) | |
| REQUEST OF THE SOUTH DAKOTA PUBLIC |) | TC-08 |
| UTILITIES COMMISSION FOR 2008 ETC |) | |
| CERTIFICATION TO THE FEDERAL |) | QWEST CORPORATION'S 2008 |
| COMMUNICATIONS COMMISSION FOR 2008 |) | ANNUAL ETC CERTIFICATION |
| FEDERAL UNIVERSAL SERVICE SUPPORT |) | FILING |
| PURSUANT TO § 20:10:32:52 |) | |

Qwest Corporation ("Qwest"), as a designated eligible telecommunications carrier, provides the following information in response to the Commission's annual reporting requirement rules in order obtain the certification necessary to continue to receive federal high-cost support.

20:10:32:53 Requirements for previously designated eligible telecommunications carriers and pending applications.

As a designated eligible telecommunications carrier, Qwest submits the information required by §§ 20:10:32:43.01 to 20:10:32:43.06.

20:10:32:43.01 Demonstration of commitment to provide service

See Attachment A

20:10:32:43.02 Submission of two-year plan

See Confidential Attachment B

20:10:32:43.03 Demonstration of ability to remain functional in emergency situations

Regarding power backup during emergencies: Qwest's Central Offices have a number of options during emergency situations that require back-up power sources. Some Central Offices have both diesel powered generators and battery backup, while the others do not have the diesel generator as a back-up source, but have only the battery backup, plus a portable hookup for a mobile generator source. The offices with a diesel generator have a battery backup for a period of not less than four (4) hours. The offices without the diesel generator have a battery backup for not less than eight (8) hours, which is plenty of time for a portable diesel unit to be transported and hooked up to the office's power junction.

Regarding the rerouting of traffic during emergencies, network element redundancy / survivability capabilities are designed into the network where it is feasible to do so. For example SONET based interoffice facility routes may be designed in a ring configuration to insure that if the fiber ring is cut, the traffic being carried on the ring is automatically rerouted bi-directionally to its intended destination. Hence, switches that serve communities across a state may ultimately feed traffic along the state's interoffice facility ring or rings. If failure occurs

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along a ring, traffic will be rerouted to reach its intended destination. It is important to note that not every route is survivable.

Regarding the management of traffic spikes during emergencies: Qwest has a Network Management Center ("NMC") that utilizes a tool called NTMOS. The NTMOS tool is capable of "choking" the network to where only a certain number of calls are permitted, and this depends upon the emergency type. For example, during an emergency like an earthquake or hurricane, when spikes would be at record levels and all traffic is in jeopardy, only the police, the fire departments, hospitals, and other emergency services may get dial tone. Thus the system is "choked" to allow for the successful completion of critical communications.

20:10:32:43.04 Demonstration of ability to satisfy consumer protection and service quality standards

Qwest plans, designs and maintains its network consistent with South Dakota Commission rule 20:10:33 and industry standards such as ANSI/IEEE 820-1984. In addition, a full-time customer service team is devoted to tracking and addressing customer complaints, including Commission complaints and executive complaints.

20:10:32:43.05 Offering of comparable local usage plan

Qwest offers flat rated service that entitles customers unlimited local calling within the local calling area and also offers basic local service on a measured basis. Terms and conditions and pricing for these offerings can be found by accessing Qwest's website at www.qwest.com and clicking on "Tariffs" at the bottom of this web page. Then select "Effective Tariff Library", "South Dakota", "SD QC Exchange and Network Services Catalog 1". Qwest's local exchange calling areas are described in Section 5.1. Qwest's flat rated service offering can be found at Section 5.2.4 and its measured service offering can be found at Section 5.2.1.

20:10:32:43.06 Provisioning of equal access

See Attachment A

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20:10:32:54 Certification Requirements

(1) A progress report on its two year service improvement plan.
Qwest submitted its first annual two year service improvement plan information pursuant to rule 20:10:32:43.02 in 2006. See Confidential Attachment B for a progress report.

(2) Detailed information on any outage
See Confidential Attachment C

(3) Number of requests for service
See Confidential Attachment D

(4) Number of complaints
See Confidential Attachment D

(5) Certification of complying with service quality standards and consumer protection rules
See Attachment A

(6) Certification that ETC is able to function in emergency situations
See Attachment A

(7) Certification that ETC is offering a local usage plan
See Attachment A

(8) Certification that ETC acknowledges that it will be able to provide equal access
See Attachment A

20:10:32:55 Lifeline and Link-up advertising requirements

Existing customer notification

In April, 2007, Qwest included a bill insert in its South Dakota consumer bills which provided customers with information on Lifeline and Link Up Telephone Assistance Programs in South Dakota. Attachment E

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New customer notification

Information on Telephone Assistance Plans, and a customer application, is included in the Welcome Packet which is mailed to each new Qwest consumer, as well as in the information packet which is sent to customers who move.

Attachment F

Qwest Web Site

Information on Telephone Assistance Plans is available at www.qwest.com/TAP. A copy of the SD Lifeline application can be printed from this site.

Attachment G

The consumer is also provided a link to the USAC web site, where the program is described in greater detail.

Annual advertisement of availability of Lifeline and Link-up Programs

Information on Telephone Assistance Plans is found in the "Consumer Tips" section of the DEX phone books.

Outreach Efforts

Throughout 2007, Qwest ran 60-second radio spots in Sioux Falls, promoting the availability of Lifeline. Attachment H

Information on Telephone Assistance Programs is also included in a Qwest "Disability Solutions" brochure, which is generally available at Qwest kiosks located at various malls. Attachment I

Monthly ads for Tribal Lifeline were run in Native Voice throughout the year, and radio ads were aired on stations which reach the reservations served by Qwest in March, 2007. Additionally, Network technicians leave a Tribal Lifeline application on each repair or installation visit they make on tribal land.

Supplemental Data Requested by the Commission Staff

Attachment J provides the residential rate sheet.

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PURSUANT TO § 20:10:32:52)**

Dated this 30th day of May, 2008

QWEST CORPORATION



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