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From: Johnson, Wayne

Sent: Friday, June 18, 2010 9:23 AM

To: LaBrie Baker, Terri

Cc: Thurber, Jon; Freeberg, Tom; Ziegler, David

Subject: Qwest Rate Center Consolidation - Additional Response to Commission Questions

Terri

In the Commission's June 1 regular session, Qwest was asked to research configurations of Local Calling Areas and Rate Centers statewide. The Commission had recently approved a Rate Center consolidation petition that Qwest had described as having a low implementation cost and almost no effect on rates, tariffs or other carriers. The primary benefit is wider availability of number portability.

Qwest has completed that research and finds that two other clusters of Rate Centers could be consolidated with the same expectations of low implementation cost and almost no effect on rates, tariffs or other carriers. One consolidation would merge the Colman Rate Center into the Flandreau Rate Center. Another would merge the Morrystown Rate Center into the McIntosh Rate Center . . . so long as the portions of the McIntosh and Morrystown Wire Centers that are in North Dakota remain as separate Rate Centers.

All other clusters of South Dakota Rate Centers, including in particular those mentioned by Commissioners on June 1, regard multiple local calling areas that overlap, impact third-party carriers, or violate another boundary (area code, number plan area, Local Access and Transport Area, or state border). These considerations would complicate those consolidations.

Qwest will continue to evaluate opportunities to broaden the availability of number portability in the state. For example, a Numbering Waiver Request has recently been filed with the South Dakota Public Utilities Commission. This request opens a new NXX and assigns to Qwest one of the number blocks so that number portability can be offered in Mitchell, SD.

Qwest will follow up with two additional requests for rate center consolidations based upon this evaluation. These will be sent via overnight today.

Thanks,

Wayne