

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.
LAWYERS

PETER L. DUNLAP³
DOUGLAS J. AUSTIN
MICHAEL E. CAVANAUGH
JOHN J. LOOSE
DAVID E.S. MARVIN⁴
STEPHEN L. BURLINGAME
DARRELL A. LINDMAN
IRIS K. LINDER
GARY C. ROGERS
MARK A. BUSH
MICHAEL H. PERRY
BRANDON W. ZUK
DAVID D. WADDELL
MICHAEL C. LEVINE
THOMAS J. WATERS
MARK R. FOX^{4, 5}
MICHAEL S. ASHTON
H. KIRBY ALBRIGHT
GRAHAM K. CRABTREE
MICHAEL P. DONNELLY
EDWARD J. CASTELLANI⁵
NAN ELIZABETH CASEY

PETER D. HOUK¹
JONATHAN E. RAVEN
THADDEUS E. MORGAN
ANNE BAGNO WIDLAK
ANITA G. FOX⁶
ELIZABETH H. LATCHANA
TODD D. CHAMBERLAIN
RYAN M. WILSON
KENNETH S. WILSON²
ROBERT B. NELSON
BRIAN P. MORLEY²
JOHN D. MILLER⁷
TONI L. HARRIS⁸
RYAN K. KAUFFMAN
JOSHUA S. SMITH
KATHERINE A. WEED
JENNIFER UTTER HESTON
DOUGLAS L. MINKE
NICOLE L. PROULX
VINCENT M. PECORA

124 WEST ALLEGAN STREET, SUITE 1000
LANSING, MICHIGAN 48933
TELEPHONE (517) 482-5800
FACSIMILE (517) 482-0887
WEBSITE WWW.FRASERLAWFIRM.COM

Writer's Direct Dial: (517)377-0875

Detroit Office
Telephone (313) 237-7300
Facsimile: (313) 961-1651

Archie C. Fraser (1902-1998)
Everett R. Trebilcock (1918-2002)
James R. Davis (1918-2005)

Of Counsel
Donald A. Hines
Ronald R. Pentecost

¹Retired Circuit Judge

²Also Licensed in Florida

³Also Licensed in Colorado

⁴Also Licensed in District of Columbia

⁵Also Certified Public Accountant

⁶Also Licensed in North Carolina

⁷Also Licensed in Georgia

⁸Also Admitted by U.S. Patent and Trademark Office

June 8, 2006

Ms. Mary Jo Kunkle
Executive Secretary
Michigan Public Service Commission
6545 Mercantile Way, Ste. 7
Lansing, MI 48911

Re: In the matter, on the Commission's own motion, to implement the provisions of
Section 301a of 2005 PA 235
MPSC Case No. U-14899

Dear Ms. Kunkle:

Enclosed for filing is Qwest Communications Corporation Filing in Response to May 25,
2006 Order.

If you have any questions, please contact my office.

Very truly yours,

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.



Mike
Ashton

Michael S. Ashton

Digitally signed by Mike
Ashton

DN: CN = Mike Ashton, C =
US, O = Fraser Law Firm
Date: 2006.06.08 14:41:47 -
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Enclosure

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

* * * * *

In the matter, on the Commission's own motion,	)	
to implement the provisions of Section 301a of	)	Case No. U-14899
2005 PA 235.	)	
_____	)	

**QWEST COMMUNICATIONS CORPORATION FILING
IN RESPONSE TO MAY 25, 2006 ORDER**

Qwest Communications Corporation ("Qwest") files this response to the Michigan Public Service Commission's ("Commission") May 25, 2006 Order, which required licensed basic local exchange providers to file certain information with the Commission regarding their implementation of primary basic local exchange service ("PBLES"). While Qwest is a licensed basic local exchange provider in the State of Michigan, Qwest does not offer residential local exchange service and has no residential local exchange tariff offerings. Thus, Qwest is not required to provide PBLES and has not implemented a PBLES tariff or offering. As discussed below, Qwest's conduct is consistent with the plain language of the Michigan Telecommunications Act, the Commission's December 20, 2005 Order in U-14731 and its consultations with the Commission Staff regarding this issue.

On November 21, 2005, Governor Jennifer M. Granholm signed into law 2005 PA 235 ("PA 235"), which amended the Michigan Telecommunications Act. Among other things, PA 235 required licensed providers of residential basic local exchange service to offer PBLES to its residential customers. MCL 484.2301a provides:

A provider licensed under this act shall offer primary basic local exchange service to each **residential** customer within the provider's service area where the provider is offering **residential** basic local exchange service. (Emphasis added.)

On December 20, 2005, this Commission issued an Order in U-14731 directing all providers of residential basic local exchange service to take steps necessary to properly implement and file a tariff for PBLES as required by MCL 484.2304. The Commission's December 20, 2005, Order stated:

Thus, each licensed provider of **residential** basic local exchange services in this state must provide primary basic local exchange service and must have a tariff for that service to be effective no later than April 1, 2006. In order to implement this statutory section in an expeditious manner, while exercising the review that the statute provides the Commission, it is necessary that all providers of **residential** basic local exchange service file tariffs for primary basic local exchange service no later than January 19, 2006. The tariffs will be filed in the normal manner of filing tariffs, and must reflect an effective date no later than April 1, 2006. Each provider must indicate which of the statutory provisions it used to set its primary basic local exchange rate and provide an evidentiary basis for a finding that the rate is just and reasonable. Finally, each filing should be conspicuously identified as being in response to this order (including the date and case number). (*Id.*, at p. 2; emphasis added.)

Thus, providers of residential service were required to file tariffs implementing PBLES.

Qwest does not offer local residential service and has no residential local exchange tariff offerings in the State of Michigan. After consultation with the Commission Staff and based on the plain language of Section 301a, Qwest did not submit a PBLES tariff because Qwest does not offer residential service in the State of Michigan. If and when Qwest offers residential local exchange service, then Qwest will comply with the requirements of the Michigan Telecommunications Act to provide PBLES.

FRASER TREBILCOCK DAVIS & DUNLAP, P.C.
Attorneys for Qwest Communications Corporation

Mike Ashton

Digitally signed by Mike Ashton
DN: CN = Mike Ashton, C = US,
O = Fraser Law Firm
Date: 2006.06.08 14:41:22 -
04'00'

Dated: June 9, 2006

By _____

Michael S. Ashton (P40474)
124 West Allegan Street, Suite 1000
Lansing, Michigan 48933
Telephone: (517) 482-5800
Facsimile: (517) 482-0887
E-mail: mashton@fraserlawfirm.com