



Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
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March 9, 2000

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Director, Administration
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Secretary/Chief Regulatory Law Judge
DANA K. JOYCE
General Counsel

Mr. Dale Hardy Roberts
Secretary/Chief Regulatory Law Judge
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

RE: Case No. TA-2000-309

Dear Mr. Roberts:

Enclosed for filing in the above-captioned case are an original and fourteen (14) conformed copies of a STAFF REPORT.

This filing has been mailed or hand-delivered this date to all counsel of record.

Thank you for your attention to this matter.

Sincerely yours,

Julie A. Kardis

Julie A. Kardis
Assistant General Counsel
(573) 751-8706
(573) 751-9285 (Fax)

JAK:sw
Enclosure
cc: Counsel of Record

FILED 2
MAR 09 2000
Missouri Public Service Commission

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED²

MAR 09 2000

Missouri Public
Service Commission

In the Matter of the Application of)
QWEST COMMUNICATIONS)
CORPORATION, for a Certificate of)
Authority to Provide Basic Local and)
Local Exchange Intrastate)
Telecommunications Services within the)
State of Missouri.)

Case No. TA-2000-309

STAFF REPORT

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and for its report states:

In the attached Memorandum, which is labeled Appendix A, Staff reports its findings in the investigation of QWEST COMMUNICATIONS CORPORATION pursuant to the Missouri Public Service Commission's Order Directing Additional Staff Review and Directing Filing issued February 2, 2000.

Respectfully submitted,

DANA K. JOYCE
General Counsel

Julie A. Kardis
Julie A. Kardis
Assistant General Counsel
Missouri Bar No. 44450

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(573) 751-8706 (Telephone)
(573) 751-9285 (Fax)

Certificate of Service

I hereby certify that copies of the foregoing have been mailed or hand-delivered to all counsel of record as shown on the attached service list this 9th day of March 2000.

Julie A. Kardis

MEMORANDUM

RECEIVED
MAR 09 2000

To: Missouri Public Service Commission Official Case File
Case No. TA-2000-309
Qwest Communications Corporation

From: Sara Buyak *SB*
Telecommunications Department

COMMISSION COUNSEL
PUBLIC SERVICE COMMISSION

[Signature] 3/9/00
Utility Operations Division/Date

[Signature] 3-9-00 *AK 3-9-00*
General Counsel's Office/Date

Subject: Qwest Communications Corporation investigation

Date: March 9, 2000

On February 1, 2000, the Missouri Public Service Commission's (Commission) Order Directing Additional Staff Review and Directing Filing requested Staff to review whether Qwest Communications Corporation (Qwest) has pending or final decisions or judgments against it from any state or federal agency involving service and marketing to customers or rates charged.

On March 2, 2000, Qwest provided its response to Staff's data requests. The response, which is attached as Exhibit A, lists such pending formal complaints and final decisions and judgments against Qwest and/or its affiliates since 1998. Staff has attempted to obtain further clarification of Exhibit A. On March 3, 2000, Staff sent Qwest an additional data request asking for a list of settlements by Qwest Communications Corporation or by its affiliates with any state or federal agency involving service and marketing to customers or rates charged to which Qwest has not responded.

The response lists all formal complaints against Qwest and its affiliates brought by a state or federal agency with regard to the provision of service, marketing, or rates, as well as all judgments or decisions resulting from such complaints since 1998. The companies are listed as Qwest Communications International Inc., Qwest Communications Inc. and LCI International Telecom Corp. These companies and their relationship to Qwest are shown on Exhibit B of the Application. The state and federal agencies with pending complaints or judgments against Qwest for slamming include the Federal Communications Commission (FCC), the Connecticut Attorney General, the Massachusetts PUC, Michigan PSC, and the Missouri Attorney General.

The Commission's Consumer Services Department has received informal complaints against Qwest Communications Corporation including: 1 in April 1998, 16 in 1999, and 3 in 2000 for slamming, and 1 in January 2000 for a disputed bill. Qwest Communications Corporation has an Interexchange (IXC) Certificate.

The Commission's Order Granting Additional Time for Staff Review, issued on February 23, 2000, states that Qwest may file a response to this Staff Memorandum by March 21, 2000. The Staff

Appendix A

Communications Corporation
Case No. TA-2000-309
Page 2 of 2

would expect Qwest to further clarify the complaints brought against it and its affiliates (whether ending in a decision or a settlement). In addition, Qwest needs to explain what actions have been taken by the company to prevent future recurrences. With that additional information, the Staff will be better able to determine whether to revise its previously filed suggestions in support of granting a basic local telecommunications certificate to Qwest.

BEFORE THE PUBLIC SERVICE COMMISSION
STATE OF MISSOURI

In the matter of the Application of)
QWEST COMMUNICATIONS CORPORATION)
for a Certificate of Authority)
to Provide Basic Exchange and Local Exchange) Case No. TA-2000-309
Intrastate Telecommunications Services within)
the State of Missouri.)

RESPONSE TO STAFF'S DATA REQUESTS

Data Request No. 1

Does Qwest Communications Corporation have either pending or final decisions or judgements against it from any state or federal agency involving service and marketing to customers or rates charged. Please list and provide detailed information.

Answer:

Please see answer to Data Request No. 3.

Data Request No. 2

Please provide a complete organizational chart showing all of Qwest Communications Corporations affiliated companies.

Answer:

Please refer to Exhibit C of the application in this case. The exhibit is a current organizational chart of the company and its affiliates including parent companies.

Data Request No. 3

Please provide a list of either pending or final decisions or judgements against the companies listed in response to request number 2, from any state or federal agency involving service and marketing to customers or rates charged.

Answer:

The chart below lists all formal complaints pending against Qwest and its affiliates brought by a state or federal agency with regard to the provision of service, marketing, or rates, as well as all judgments or decisions resulting from such complaints since 1998. This chart does not address settlements, pending investigations, or other inquiries non-responsive to the

data request.

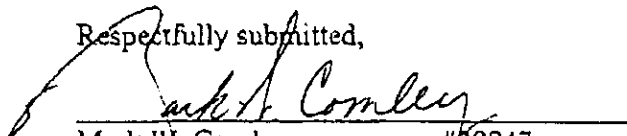
**PENDING FORMAL COMPLAINTS AND FINAL DECISIONS
AND JUDGMENTS AGAINST QWEST SINCE 1998**

AGENCY	COMPANY	NATURE OF COMPLAINT	STATUS
Federal Communications Commission	Qwest Communications, International Inc.	Slamming.	Notice of Apparent Liability for Forfeiture filed at the Commission on October 19, 1999.
Connecticut Attorney General	Qwest Communications International, Inc.	Slamming.	Pending complaint filed in state court on May 13, 1999.
Massachusetts PUC	Qwest Communications Inc. (not a properly named party)	Slamming.	Two judgments issued by Commission on December 20, 1999 and January 5, 2000.
Michigan PSC	LCI International Telecom Corp.	Slamming.	Two judgments issued by Commission on December 16, 1999 and January 19, 2000.
Missouri Attorney General	LCI-International Telecom Corp.	Slamming.	Pending complaint filed in state court on March, 1998.

The information above provided to the Missouri Public Service Commission Staff in response to the above data requests is accurate and complete, and contains no misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission staff if, during the pendency of this case before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

The responses to these data requests have been prepared by the Applicant.

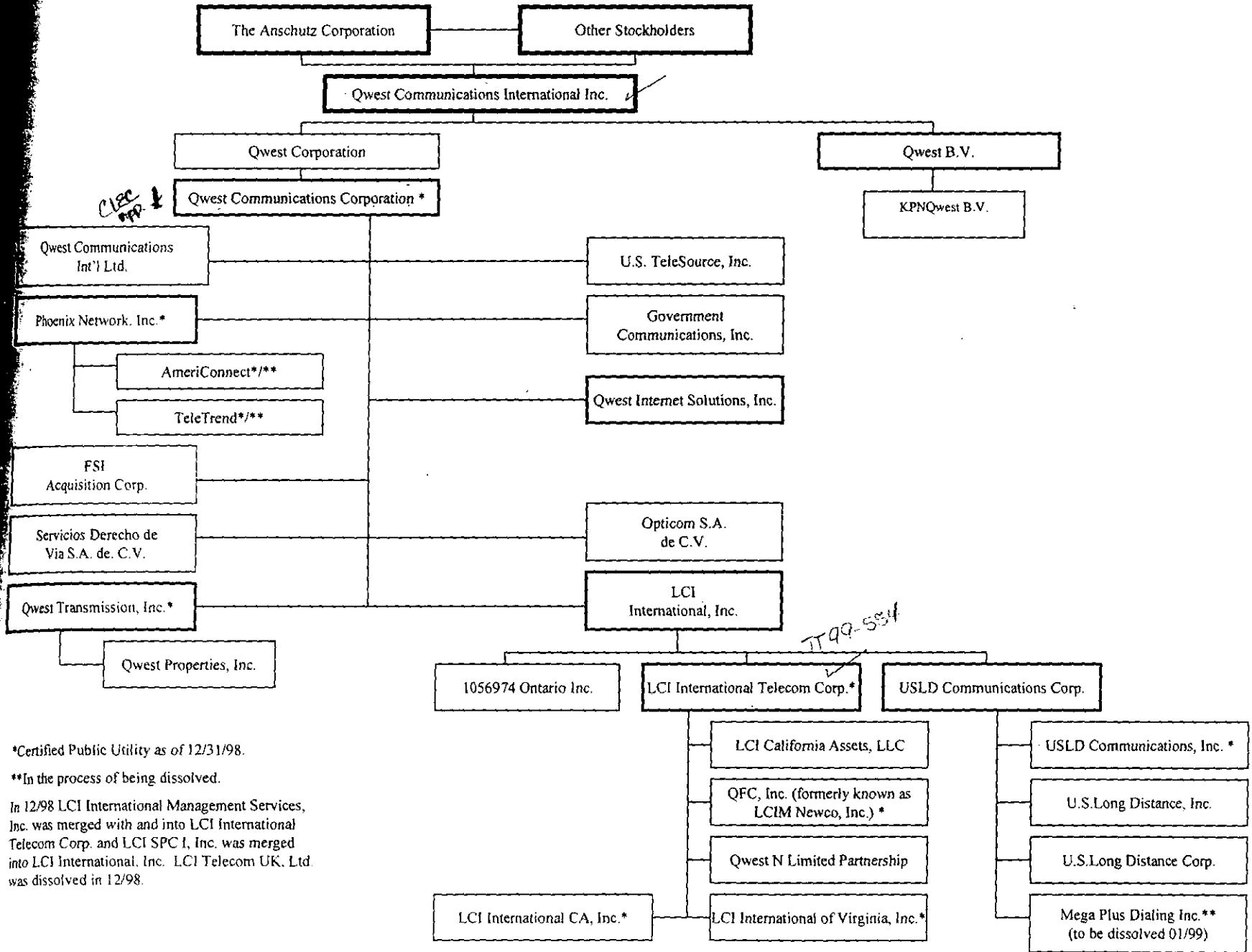
Respectfully submitted,



Mark W. Comley #28847
Newman, Comley & Ruth P.C.
601 Monroe Street, Suite 301
P.O. Box 537
Jefferson City, MO 65102-0537

Attorneys for QWEST COMMUNICATIONS
CORPORATION

Corporate Ownership/Organization
As of 06/2/99



*Certified Public Utility as of 12/31/98.

**In the process of being dissolved.

In 12/98 LCI International Management Services, Inc. was merged with and into LCI International Telecom Corp. and LCI SPC I, Inc. was merged into LCI International, Inc. LCI Telecom UK, Ltd. was dissolved in 12/98.

**Service List for
Case No. TA-2000-309
March 9, 2000**

**Office of the Public Counsel
P.O. Box 7800
Jefferson City, MO 65102**

**Paul G. Lane/Katherine C. Swaller/
Leo J. Bub/Anthony Conroy
Southwestern Bell Telephone Company
One Bell Center, Room 3520
St. Louis, MO 63101-1976**

**Mark W. Comley
Newman, Comley & Ruth
P. O. Box 537
Jefferson City, MO 65102-0537**