Qwest Corporation Law Department (612) 672-8905-Phone (612) 672-8911-Fax

Jason D. Topp Corporate Counsel 200 South 5th Street, Room 2200 Minneapolis, MN 55402



January 14, 2008

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

Re: Qwest Corporation's Application for Waiver of Switched Access Cost Study

Dear Ms. Van Gerpen:

Enclosed for filing is Qwest Corporation's Application for Waiver of Switched Access Cost Study regarding the above-referenced matter.

Very truly yours,

Jason D. Topp

JDT/bardm

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of January, 2008, the foregoing **QWEST CORPORATION'S APPLICATION FOR WAIVER OF SWITCHED ACCESS COST STUDY** 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:

Jason D. Topp Qwest Corporation 200 South 5th Street, Room 2200 Minneapolis, MN 55402 Jason.topp@qwest.com Colleen E. Sevold Qwest Corporation 125 South Dakota Avenue 8th Floor Sioux Falls, SD 57194 colleen.sevold@gwest.com

Dianne Barthel

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF SOUTH DAKOTA

QWEST CORPORATION'S APPLICATION FOR WAIVER OF SWITCHED ACCESS COST STUDY	TC
COST STODI	

Qwest Corporation ("Qwest") respectfully asks the Public Utilities Commission to grant it a waiver, under ARSD § 20:10:27:02, of the switched access cost study required by ARSD § 20:10:27:07.

ARSD § 20:10:27:07 requires a carrier's carrier to file cost data in support of its switched access service tariff no less than once every three years. ARSD § 20:10:27:02 provides that the Commission may, for good cause shown, either by its own motion or by application from a carrier's carrier, temporarily waive or suspend any rule in chapter 20:10:27.

Qwest requests a waiver of the cost study requirement because (1) producing such a study is costly and consumes a great deal of resources; and (2) Qwest does not intend to raise access rates at the time, although preliminary analysis indicates that a cost study would likely support higher rates than even those from the last study.

WHEREFORE, Qwest submits that it has provided the Commission with good cause and it respectfully asks the Commission to temporarily waive or suspend the requirement in ARSD § 20:10:27:07 for the current three-year study period.

Respectfully submitted this 14th day of January, 2008.

QWEST CORPORATION

Jason D. Topp 200 South Fifth Street Room 2200

Minneapolis, MN 55402 (612) 672-8905