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Jason D. Topp
Corporate Counsel



November 6, 2006

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

**Re: In the Matter of Revisions and/or Additions to the Commission's General
Rules of Practice Codified in ARSD 20:10:01
Docket No. RM06-003**

Dear Ms. Van Gerpen:

Enclosed for filing is Qwest Corporation's Comments regarding the above-referenced matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Jason D. Topp".

Jason D. Topp

JDT/bardm

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of November, 2006, the original and 10 copies of the foregoing **QWEST CORPORATION'S COMMENTS** were served 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
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Dianne Barthel

**SOUTH DAKOTA
PUBLIC UTILITIES COMMISSION**

**IN THE MATTER OF REVISIONS
AND/OR ADDITIONS TO THE
COMMISSION'S GENERAL RULES OF
PRACTICE CODIFIED IN ARSD 20:10:01**

RM06-003

QWEST CORPORATION'S COMMENTS

Qwest appreciates the efforts of the Commission to institute an electronic filing process. Such an approach will significantly decrease burdens on Commission staff and the parties.

We do not see a need to make any modifications to the rules. Nonetheless, there are a few issues that arise from the rules that should be clarified to smooth the transition to this process. Specifically:

1. Confidential Treatment - What will be done with a confidential document once it is filed with the Commission? Currently, confidential documents are filed in a separate sealed envelope. The changes to Rule 20:10:01:41 contemplate filing such documents electronically, but it is unclear, once the filing is made with the Commission, how the Commission will handle the document.

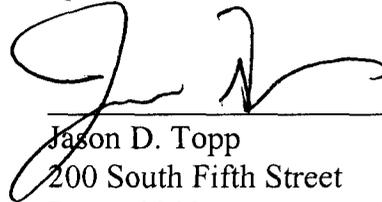
2. Letter Associated with Confidential Filings. Rule 20:10:01:41 (5) discusses a letter indicating that the party requests confidential treatment. Does the request for confidentiality generally discussed in Rule 20:10:01:41 meet this requirement or does the rule contemplate both a cover letter and a separate document making the request for confidentiality?

3. Verification of Filings. Will there be a confirming email or other method for parties that make filings to determine that in fact the filing has been received by the Commission?

Thank you for your efforts with this topic.

Dated this 6th day of November, 2006.

QWEST CORPORATION

A handwritten signature in black ink, appearing to read "J. Topp", is written over a horizontal line.

Jason D. Topp
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