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BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

RICHARD KEAVY,

COMPLAINANT,

v.

QWEST CORPORATION DBA
CENTURY LINK
COMMUNICATIONS LLC,

RESPONDENT.

QWE – T – 21 – 14

REQUEST FOR EXTENSION OF TIME

COMES NOW Respondent Qwest Corporation dba CenturyLink Communications, LLC, (“CenturyLink”) and, hereby designates Party Representatives under Rule 41 and also requests an extension of time in which to respond to the Formal Complaint filed by Mr. Keavy on or about January 13, 2022.

I. FACTS

Complainant Richard Keavy of Boise, Idaho filed a Formal Complaint in or about early January 2022, alleging problems involve “trace calls,” and allegedly unsuccessful efforts to resolve the problem through Respondent’s Customer Service Representatives.

The Formal Complaint was served via U.S. Mail (Certified) to an office in Hood River, Oregon, on or about January 13, 2022, which was received and “signed for” by one Alisa Mooney on January 21, 2022. The Hood River addressee of the envelope containing the Formal Complaint was one Tre Hendricks, Associate General Counsel of Lumen Technologies, an affiliate of Respondent.

Due to COVID protocols within the Respondents’ family of companies, including Lumen Technologies, Mr. Hendricks worked from home throughout January, 2022, and never received the envelope for which Ms. Mooney signed on January 21. Late last week was his first actual notice of the Formal Complaint with Idaho Deputy Attorney Generals forwarded a copy of said pleading via email.

Mr. Hendricks was unaware of any underlying dispute between CenturyLink and Complainant. However, Mr. Hendricks and CenturyLink take this matter seriously and intend to investigate the Formal Complaint and respond to it. The additional time will also provide CenturyLink representatives a better opportunity to understand Complainant’s issues and hopefully address them without having to resort to litigation. The facts alleged in the complaint are confusing and it does not appear to seek any relief for which it appears the Commission can grant relief. CenturyLink therefore requests a 14 extension to respond, i.e, to and through February 28, 2022. If possible, it is CenturyLink’s hope to resolve this dispute with the customer complainant informally.

II. RELIEF REQUESTED

Wherefore, in light of the above, Respondent hereby requests an extension of time to and including February 28, 2022, in which to file a response to the Formal Complaint.

III. PARTY DESIGNATION

Pursuant to Rule 41, Respondent hereby designates:

William “Tre” Hendricks, Esq.
Associate General Counsel
Lumen Technologies
902 WASCO Street, Floor 1
Hood River, OR 87031
541 387 9439
Tre.Hendricks@lumen.com

—and—

Stephen R. Thomas, Esq.
HAWLEY TROXELL ENNIS & HAWLEY LLP
877 W. Main Street, Suite 1000
Boise, ID 83702
208 344 6000
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IV. CONCLUSION

Respondent respectfully requests additional time through 28 February 2022 in which to respond to the Formal Complaint, due to lack of actual prior notice arising out of COVID protocols and Mr. Hendricks’ prolonged absence from his physical office.

Respectfully submitted,

HAWLEY TROXELL ENNIS & HAWLEY, LLP



By Stephen R. Thomas

CERTIFICATE OF SERVICE

I hereby certify that I have this 14th day of February, 2022, served the foregoing REQUEST FOR EXTENSION OF TIME, in Case QWE-T-21-14, by forwarding a copy thereof, to the following:

Mr. Richard Keavy
11282 Glen Ellyn
Boise, Idaho 83713
(via U.S. Mail)

Taylor R. Brooks
Office of the Attorney General, State of Idaho
Deputy Attorney General
Idaho Public Utilities Commission
11331 W. Chinden Blvd.
Boise, Idaho 83714
(via email: taylor.brooks@puc.idaho.gov)

Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 W. Chinden Blvd., Bldg. 8, Ste. 201-A
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