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August 1, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

Re: *Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Colorado, Idaho,
Iowa, Nebraska and North Dakota, WC Docket No. 02-148*

*Application of Qwest Communications International, Inc.
To Provide In-Region InterLATA Services in the States of Montana,
Utah, Washington & Wyoming, WC Docket No. 02-189*

Dear Ms. Dortch:

At the request of the Commission staff, yesterday Jeff Owens, Dave Teitzel, John Munn, Brad Deutsch and Hance Haney, representing Qwest, spoke with Elizabeth Yockus and Pam Megna to address certain Track A issues.

Qwest first addressed the differences between the listings quantities in the service category entitled "Facility-Based CLEC White Pages Listings" and the listings quantities in the service category entitled "UNE-Platform" in the confidential exhibits to the Teitzel Declaration.

Mr. Teitzel explained that the white pages listings quantities shown in the category "Facility-Based White Pages Listings" represent listings in Qwest's white pages database associated with customers served by CLECs who serve customers via the CLEC's own switch. These include CLEC end users served exclusively via a CLEC switch and CLEC-owned outside plant facilities, and end users served via the CLEC's switch and unbundled loops purchased from Qwest. This category does not include any white pages listings for CLEC customers served through a Qwest switch, either through resale or UNE-Platform (see footnote 51 in Mr. Teitzel's Qwest I declaration and footnote 50 in Mr. Teitzel's Qwest II declaration). It should be noted that, since all customer lines do not appear in the white pages directory, white pages listings under-represent the actual number of customer access lines served by CLECs.

In the "UNE-Platform" category in the confidential exhibits to Mr. Teitzel's declaration, Qwest reported the number of UNE-P lines in service, by CLEC. To determine an estimate of the portion of those lines that are used by residential and business customers, the telephone numbers associated with all UNE-P lines in service were compared with Qwest's white pages database to determine which telephone numbers appeared in the residential and business sections of the directory database. Those values are reported in the columns entitled "Bus. in Listings Database" and "Res. in Listings Database." Again, since many access lines do not appear in the white pages listings, the count of UNE-P telephone numbers appearing in the listings database is less than the total of UNE-P lines actually in service.

Some confusion may result from the use of the term "Facilities-based" by Qwest in a somewhat different way than the FCC has used the term in the past. For example, the FCC has used the term "Facilities-based" to include a CLEC's use of its own facilities, stand-alone UNE elements as well as a CLEC's use of UNE-P. Qwest does not quarrel with this approach. However, to draw a distinction between CLECs who serve their customers exclusively from their own switches, versus those who serve customers through UNE-P, Qwest refers to the first as "Facility-based" and the latter as "UNE-P." Thus, it is important to note that the "Facilities-Based White Pages Listings" (discussed in paragraph 1 above) and the "UNE-Platform" listings (discussed in paragraph 2 above) are quite different. The "Facilities-Based White Pages Listings" category only includes listings associated with customers served by a CLEC utilizing its own switch. In contrast, "UNE-Platform" listings includes only those listings associated with CLEC customers served by a Qwest switch through UNE-P. As such these two lists are entirely separate subsets of listings from the white pages database: one category is not subsumed within the other.

Qwest secondly explained why no E911 records appear for Silver Star Telephone Company in the Wyoming E911 records counts in the confidential Wyoming exhibits to Mr. Teitzel's declaration.

Mr. Teitzel explained that Silver Star has overbuilt Qwest's loop facilities by installing its own loop facilities in Afton, Wyoming. Silver Star is providing local exchange service, using its own loop and switching facilities, to a substantial number of residential and business customers in that community. To serve these customers, Silver Star is utilizing prefix 885, provided from the local Silver Star switch. The 885 prefix is used solely for Silver Star customers in Afton, Wyoming.

Afton, Wyoming is within Lincoln County, which has generally been upgraded to E911 capability. However, Silver Star has not yet requested that the 885 prefix be loaded into the E911 system, and Silver Star is not yet reporting data to Intrado, Qwest's third party E911 database administrator, for customers located in Afton. Therefore, no Silver Star records appear in the E911 database for Qwest's Afton exchange. However, Silver Star, as a facilities-bypass local exchange provider, does have a significant number of residential

and business customer listings in Qwest's listings database which may be utilized as a conservative indicator to approximate the number of Silver Star lines in service within Qwest territory in Wyoming (see footnote to Confidential Exhibit DLT-Track A/PI-WY-1, page 4 of 10).

The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,

A handwritten signature in cursive script that reads "Hance Haney".

cc: M. Carowitz
E. Yockus
G. Remondino
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