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August 6, 2002

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 staff of the Wireline Competition Bureau, Qwest has provided the attached document detailing minor corrections in paragraphs 2 and 110 of the Reply Declaration of Lynn M. V. Notarianni & Christie L. Doherty in WC Docket No. 02-148.

Paragraph 2 is modified to show that one flow-through eligible LNP LSR has been received in both Idaho and Iowa via IMA-EDI over the past six months. Paragraph 110 is modified to show that Qwest did not miss the benchmark for LNP orders submitted via IMA-EDI in Colorado in May or June or in Iowa in May.

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

Sincerely,

A handwritten signature in black ink that reads "Hance Haney". The signature is written in a cursive, flowing style.

cc: M. Carowitz  
E. Yockus  
G. Remondino  
M. Cohen  
R. Harsch  
J. Jewel

P. Baker  
C. Post  
P. Fahn  
B. Smith  
J. Myles  
J. Stanley  
S. Vick  
J. Orchard  
C. Washburn  
S. Oxley

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## 2. Iowa

7. Qwest missed the benchmark for LNP for PO-2B-2 in June.<sup>6</sup> As in Idaho, only one flow-through-eligible LNP LSR has been received in ~~Idaho~~-Iowa via IMA-EDI over the past six months. This order was received in June and did not flow-through. As described above, the June result is not indicative of Qwest's capabilities of flowing through LNP orders.

110. Qwest's commercial performance results under PO-2B (in the aggregate) show that Qwest flowed through a high rate of flow-through-eligible orders from January through April, 2002.<sup>122</sup> Qwest has flowed through an even higher rate of flow-through-eligible orders in May 2002 and June 2002.<sup>123</sup> Qwest met the benchmarks for Unbundled Loops and UNE-P under PO-2B in each of the five states subject to the Application in each of the past two months.<sup>124</sup> Although Qwest missed the benchmarks for Resale orders submitted via IMA-EDI in Nebraska in June and for LNP in

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<sup>6</sup> See Iowa Commercial Performance Results at 53 (PO-2B-2).

<sup>122</sup> OSS Decl. at ¶¶309-331.

<sup>123</sup> See Colorado Commercial Performance Results at 52-55 (PO-2B); Idaho Commercial Performance Results at 49-52 (PO-2B); Iowa Commercial Performance Results at 51-54 (PO-2B); Nebraska Commercial Performance Results at 51-54 (PO-2B); North Dakota Commercial Performance Results at 45-48 (PO-2B).

<sup>124</sup> See Colorado Commercial Performance Results at 53, 55 (PO-2B); Idaho Commercial Performance Results at 50, 52 (PO-2B); Iowa Commercial Performance Results at 52, 54 (PO-2B); Nebraska Commercial Performance Results at 52, 54 (PO-2B); North Dakota Commercial Performance Results at 46, 48 (PO-2B).

~~Colorado, Idaho and Iowa~~ (in May and June) and Iowa (in June), the reasons for each of these misses are easily explainable and do not reflect a systemic problem. <sup>125</sup>

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<sup>125</sup> See, *infra*, Section I(A).