

R. Hance Haney
Executive Director – Federal Regulatory

1020 19th Street NW, Suite 700
Washington, DC 20036

202 429 3125
202 293 0561 fax
Email hhaney@qwest.com



August 20, 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:

Qwest hereby responds to several questions from the Wireline Competition Bureau concerning how Qwest defines UNE-P, the availability of UNE-P Star(*), distinctions between the products, conversion to UNE-P* and UNE-P* pricing, billing and performance reporting. The responses are attached.

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

QUESTION:

Please define UNE-P or point to the definition in the record.

RESPONSE:

The definition for UNE-P is provided in the Simpson/Stewart Checklist Item 2 Declaration filed June 13, 2002, at paragraphs 41-42.

QUESTION:

Is the UNE-Star product no longer available?

RESPONSE:

The UNE-Star product is still available.

QUESTION:

Is there any remaining distinction between the UNE-P product and the UNE-*?

RESPONSE:

There are distinctions between UNE-P and UNE-Star in pricing and in feature availability. UNE-Star differs from UNE-P in pricing (for example, loops are not deaveraged and some MOUs are included in the flat rate price). Some AIN features are available with UNE-Star, and UNE Star also includes Voice Messaging Service (VMS) at retail rates, whereas, UNE-P does not make VMS available.

QUESTION:

Is the conversion of UNE-* to UNE-P merely a change in the billed rate?

RESPONSE:

The conversion of UNE-Star to UNE-P is a change in billing rate and could also be a change in end-user features if the end-user had a UNE-Star feature not available with UNE-P, such as voice messaging.

QUESTION:

What is the billing rate difference between UNE-* and resale?

RESPONSE:

UNE Star prices were set at a price and on terms that reflected a weighted average price of the de-averaged volumes based upon McLeod- and Eschelon-provided forecasts that indicated de-averaged zone distribution, and included recovery of the cost of features and Qwest's underlying administrative costs. The pricing also included a flat-rated local usage component, which utilizes an average local switching business usage assumption.

QUESTION:

Please provide evidence that the McLeod is actually incurring/paying the correct charges and not being charged and billed for resale for the lines Qwest categorizes as UNE-P in the confidential filing.

RESPONSE:

McLeod is beginning charged for the UNE-Star services it receives consistent with its interconnection agreements. These charges are set forth in state specific interconnection agreements which have been filed and approved by the respective states. These prices were the result of negotiation between Qwest and McLeod and have previously been provided to the Commission Staff. As described above the major aspects of the pricing reflect statewide average pricing, a flat rated usage component and the inclusion of a variety of line features in a package price. That pricing was not derived from and is unrelated to resale discounts.

Qwest believes this question relates to allegations McLeod USA Telecommunications Service, Inc. (McLeod) made in its Reply Comments in WC Docket No. 02-148 filed on July 29, 2002, at pages 3-4. McLeod is correct that the prices for UNE-M are set forth in the McLeod interconnection agreement and are billed through an agreed to process that results in "net" UNE-M charges consistent with its interconnection agreement. Qwest temporarily suspended this netting process in early 2002 because of an unrelated dispute. On July 25, 2002, Qwest made a payment to McLeod to reflect the appropriate netting, applicable to the suspension period, to reflect approved UNE-M prices. With this payment UNE-M prices have consistently been appropriately calculated and charged.

QUESTION:

Are the McLeod and Eschelon figures listed in the confidential appendices (UNE-P, UNE-*, or some combination)?

RESPONSE:

The figures listed in the confidential appendices (performance results) are a combination of UNE-P and UNE-Star.