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August 23, 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:

The Wireline Competition Bureau requested that Qwest provide an explanation as to why Qwest's commercial performance for PID MR-3 (UT) out of service cleared within 24 hours, UNE-P-POTS (dispatch) dropped so precipitously in June, 2002 (from around 90% (which was parity with retail) to 83% - when retail remained at 90%.

Qwest's investigation of its repair performance in Utah for UNE-P (POTS) under PID MR-3A (dispatched) for June 2002 yields the following:

1. 25%, or 3, of the 12 trouble tickets missing the 24-hour criterion of MR-3 involved CLEC requests for future repair appointments, for which there was no system or process in place to identify and exclude them. (However, in mid-July, a process was put in place that will enable such tickets to be excluded. Accordingly, going forward, this issue will not exist.)

Excluding the three requests for future repair appointments would raise the CLEC results for MR-3A from 82.6% to 87.0%, compared to the retail analogue result of 89.9%. When taking statistical variance into account, this would represent parity, with a modified Z score of 0.79 (against a critical value of 1.645 for the 95 percent confidence level) and a parity score of -0.52 (based on modified Z test).

2. In addition, a cable cut, caused by an outside third party, affected one of the 12 trouble tickets missing the 24-hour criterion. If this also had not been counted against Qwest, this

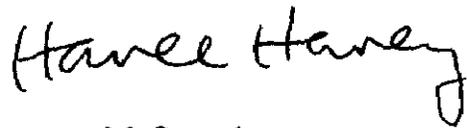
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MR-3A result would have raised further, from the above-revised 87.0% to 88.4% (also at parity, with a mod. Z score of 0.40 and parity score of -0.76).

This is in the context that all other months in the 12 months reported are at parity for this product and measurement.

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

Sincerely,



cc: M. Carowitz
E. Yockus
G. Remondino
M. Cohen
R. Harsch
J. Jewel
P. Baker
C. Post
P. Fahn
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