

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 27, 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 the following questions from the Wireline Competition Bureau regarding Daily Usage Feed (DUF).

QUESTION:

Why is Qwest phasing out its provision of DUF via magnetic tape or cartridge?

RESPONSE:

Qwest is phasing out its distribution of the DUF via magnetic tape and cartridges due to a few factors. The creation, handling, and distribution of magnetic tapes/cartridges involves slow, manually-intensive processes. These methods are costly to both Qwest and the receiving organizations. There are few CLECs that still receive their DUF via magnetic tapes/cartridges, so maintaining these processes is inefficient. Additionally, the servicing of the equipment to produce and process tape and cartridge is becoming more difficult with the lack of vendors that continue to support the maintenance of this type of media. As a result, with the proliferation of other, more efficient, methods of DUF delivery (such as the Internet), the case for continuing to support these technologies no longer makes sense. For these reasons, Qwest has been working with the CLECs still receiving magnetic tape/cartridges to smoothly transition them to another transmission method.

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QUESTION:

How many CLECs receive DUF via magnetic tape or cartridge?

RESPONSE:

As of 08-19-02, there were 9 CLECs operating in the Western and Central CRIS regions receiving DUF transmissions via magnetic tape and/or cartridge. (DUFs are created by CRIS at a regional level, rather than producing state by state DUFs.)

QUESTION:

Has Qwest received any complaints or concerns regarding its removal of DUF delivery via magnetic tape or cartridge?

RESPONSE:

At least four CLECs expressed concerns about the conversion. These were essentially regarding the timing and inconvenience of having to make a change. Most of these concerns have been addressed, and the conversion has taken place. Others are still receiving tape/cartridges, and Qwest will continue to support them with this delivery mechanism until a mutually agreeable conversion timeframe is reached. Alternative methods of delivery available to the CLECs include Network Data Mover (NDM), File Transfer Protocol (FTP) and Internet access. These are the methods the majority of our CLECs are choosing to receive their DUF.

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
B. Smith
J. Myles

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J. Stanley
S. Vick
J. Orchard
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