

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 28, 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 of Qwest's performance under OP-4 (Installation Interval - UNE-P Centrex (dispatch)) for Washington. In particular, the Bureau requested that Qwest explain the 31.5 day installation interval for CLECs in March, 2002 and provide an explanation for Qwest's performance from March through June, 2002, when Qwest's performance was below parity for competing LECs versus Qwest's retail services.

UNE-P-Centrex OP-44A (dispatches within MSAs) results for the state of Washington during March 2002 through – June 2002 were in parity for two of the four months. During the months of March 2002 and May 2002, Qwest wholesale performance was less than that for retail due to: (1) customer caused delays and (2) shorter than standard intervals inappropriately offered by the retail business office. In Washington, CLECs placed only two orders for UNE-P Centrex during the month of March. One order took 56 days to install, which resulted in a 31.5 day average wholesale interval. This order took 56 days to complete because the customer did not complete additional conduit work in a timely manner, and failed to provide Qwest with location/access to the Subscriber Network Interface (SNI). According to notes in Qwest's records, there were three due date changes with customer caused reasons. Because one of the customer caused jeopardies was mistakenly coded as Qwest facilities, the additional time was erroneously included in Qwest's reported results. If the order with the 56 day installation interval was removed from the measurement, the CLEC result would have been 7 days in comparison with a

retail result of 3.36 days. The second order had a customer-requested interval of seven days.

As recognized in the approved PID, Qwest currently does not have the ability to exclude customer requested longer than standard intervals for products reported under MSA-type disaggregation that require a technician dispatch.

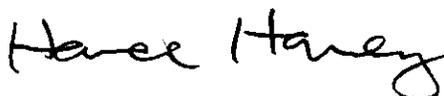
One UNE-P-Centrex order was placed by a CLEC during the month of May. Qwest installed this order within the standard interval of five days. However, at the time this order was placed, Qwest retail was still able to offer shorter than standard intervals for specific change orders for retail customers. Since this was a violation of Qwest policy, Qwest implemented additional system improvements to restrict its retail personnel from offering shorter than standard intervals. The first system change was completed in April, which restricted New (N) and Transfer (T) orders to standard intervals. An additional system change in September will mechanically restrict retail Change (C) orders to standard intervals. Once the additional fix is completed in September, October PID results should reflect parity performance.

**UNE-P Centrex
Performance
OP4 Results
Washington**

Month	# of CLEC Orders	CLEC - Average # of Days to Install	CLEC standard Interval	# of Qwest Orders	Qwest Average # of Days to Install	Retail Standard Interval
March	2	31.5	5	329	3.36	5
April	5	4	5	356	3.44	5
May	1	5	5	465	2.96	5
June	1	5	5	266	3.18	5

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

Sincerely,



cc: M. Carowitz

Marlene H. Dortch
August 28, 2002
Page 3

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