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August 29, 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 has requested information regarding the status of Starred (*) PIDs. Specifically, the Bureau seeks confirmation that these PIDs are informal and provided for informational purposes.

Qwest explains the creation and purpose of the * PIDs in the written declaration of Mike Williams for the ROC II filing in paragraph 21. To explain further, the "starred" or "asterisked" PIDs consist of OP-5*, MR-7*, and MR-8*. Specifically, they represent what Liberty Consulting audited as OP-5, MR-7, and MR-8 and released as being accurate and reliable, with one additional exclusion -- namely, trouble tickets with "no trouble found" (or "NTF") that also had no additional troubles within 30 days where actual trouble was found. Thus, Liberty audited these three measurements with "NTF" tickets included, and Qwest also displays a version of these with "NTF" tickets excluded.

Qwest does report results for these three asterisk-type PIDs as additional information, but not "only" for that purpose. Where the asterisked results can help explain apparent disparities in the results displayed for the non-asterisked PIDs, Qwest includes this in the overall evidence it relies upon to demonstrate that it is satisfying checklist requirements -- in this case, to provide evidence that the apparent disparities are not due to discrimination.

The exclusion of "no trouble found" tickets from the results reported for PIDs that Liberty has audited consists of a clearly-defined, easily identifiable set of trouble tickets. This practice answers the appropriate question of, "what would the results look like if NTF

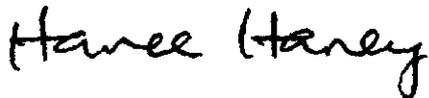
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tickets were excluded?" No party has come forth with evidence to challenge the assertions Qwest has made with this data.

Overall, this is done under Qwest's understanding that the FCC expects Qwest to provide additional evidence to explain, where possible, why results that appear to be disparate are, in fact, not due to discrimination. Thus, generally, where OP-5, MR-7, or MR-8 results appear to show disparity, Qwest will point to the asterisked results to show that there is evidence that the reason is not due to discrimination but, rather, due to the volume of "no trouble found" tickets.

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

Sincerely,

Handwritten signature of Hamee Haney in cursive script.

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