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August 30, 2002

**Ex Parte**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> 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 a request from the Wireline Competition Bureau for an explanation of Qwest's performance in Washington for OP-3 (Installation Commitments Met-EELs).

In most of its states, Qwest is not required to build high capacity facilities on demand for CLECs. Washington is the exception requiring Qwest to hold all UNE orders indefinitely. Moreover, since Qwest negotiated the 90% EEL benchmark, Qwest agreed to impose its 30 business day hold policy to EELs as well. To the extent that one order is held for lack of facilities and is eventually filled, given the volume of EELs ordered it can take Qwest below the benchmark. Qwest's EEL performance in Washington has been directly impacted by shortage of facility issues and the held order policy.

Qwest met the EEL 90% commitments met objective in March and April, before the new held order policy went into effect, and missed the objective in May and June. Qwest will therefore address the performance misses in those two later months.

- Qwest performance data shows it provisioned 17 EELs in May meeting 14 of the commitments (82.35%) on time. Of the 3 missed orders in May, one concerned lack of available IOF and a second concerned lack of available loop plant. Once Qwest had the necessary facilities to provision the EEL, Qwest provided them within the standard interval. If Qwest measured its performance from the time

when it had available facilities, Qwest provisioned 16 of 17 EELs on time, or 94.1%

- Qwest performance data shows it provisioned 16 EELs in June and missed four of its commitments (75%) on time. Of the four misses, three concerned lack of available facilities; one due to lack of IOF and two due to lack of loop plant. Again, if Qwest measured its performance from the time when it had available facilities, Qwest provisioned 15 of 16 EELs on time, or 93.8%

Qwest is investigating improvements to its engineering and construction processes for the installation of EELs in order to accelerate internal timeframes with emphasis on meeting the Original Due Date. Low CLEC volumes influence the result of this PID. As volumes approach a sufficient number to allow members of the provisioning teams to have regular experience installing EELs, Qwest's overall performance will improve.

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

Sincerely,

*Hance Haney*

cc: M. Carowitz  
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