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August 30, 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 that Qwest clarify when Qwest issues a SOC and to comment on Covad's claim that a SOC is issued as a result of a FOC, not when the work is completed.

Contrary to Covad's claims, the SOC is not based on the FOC, it is driven from the internal service orders issued. As described in the August 8, 2002 Ex Parte, once the last service order associated with the LSR has completed in the SOP, the LSR is considered complete. An LSR-level completion notice, commonly referred to as a SOC, is sent to the CLEC signaling all requested work has been completed. The timeliness of this notification is measured in PID PO-6.

Covad's "fake SOC" issue was centered on line sharing which did have a problem whereby a limited number of internal service orders completed before the physical work was completed. The problem has been addressed through a process change as described in the Reply Declaration of Karen A. Stewart. As Ms. Stewart explains, when the central office work associated with Line Sharing is not completed by 4PM local time, the Qwest technician will place the order in jeopardy status. The jeopardy status will prevent the service order from being completed in the SOP prematurely. Since completion of the service order is the trigger for generating the SOC, placing the internal service order in jeopardy status also prevents issuance of the LSR SOC until Qwest confirms the physical work has been completed after which the service order is completed.

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

Sincerely,

Hancee Hancey

cc: M. Carowitz
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