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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 a request from the Wireline Competition Bureau for further explanation for why Qwest's performance in repair appointments met for UNE-P-POTS and UNE-P-Centrex 21(MR-9) (especially in Utah) is checklist compliant.

In multiple 271 decisions, the FCC has made plain that "[w]here there are multiple performance measures associated with a particular checklist item, the Commission would consider the performance demonstrated by all the measurements as a whole." See, e.g., Pa. 271 Appendix C at para 9. Checklist Item 2 comprises several different metrics including, but not limited to, Qwest's OSS interface performance, and all aspects of UNE Combinations. As explained in the direct and rebuttal declarations of Michael Williams, Qwest's overall performance on checklist item 2 is very strong. Looking at UNE-P repair performance for these two products (UNE-P-POTS AND UNE-P-Centrex 21) alone, however, also show that, overall, Qwest is repairing these lines at an extremely high level of quality.

A. UNE-P-POTS

For UNE-P-POTS, Qwest's performance data shows:

- Qwest cleared a vast percentage of out of service troubles within 24 hours, and always at parity with Qwest in each of the last six months. This was true irrespective of whether or not a technician dispatch was required. Utah Checklist Item Format MR-3 at pp. 88, 89 and 91. When no technician dispatch was required, in each of the last six months Qwest cleared between 97% and 100% of such troubles within 24 hours.

- Qwest cleared all troubles in a mean time to restore well below 24 hours, and always at parity with retail performance. This was true irrespective of whether a technician dispatch was required. Utah Checklist Item Format MR-6 at pp. 88, 90 and 91. When no technician dispatch was required, in each of the last six months Qwest cleared all troubles in an average of 5 hours or less.

- CLECs also experienced a comparable percentage of repeat troubles on UNE-P-POTS lines irrespective of whether a technician dispatch was required. When "no trouble found" tickets are excluded, Qwest's performance data shows that the repeat trouble metric is at parity in at least 4 of the last 6 months. Utah Checklist Item Format MR-7* at pp. 88, 90 and 91.

- The overall trouble rate for UNE-P-POTS is always 1.2% or less and always at parity with Qwest's retail performance. Utah Checklist Item Format MR-8 at p. 92.

Overall, therefore, Qwest's record or repairing UNE-P-POTS lines is very strong. Even MR-9 (Repair Appointments Met), however, is strong when the performance is analyzed holistically. The Commission's question is focused on one small piece of Qwest's repair performance; specifically, repair appointments that require a dispatch of a technician inside an MSA (MR-9A). That data shows 70% to 95% repair appointments met in each of the last 6 months, which was at parity in 2 of these months. Utah Checklist Item Format MR-9 at p. 89. However, when technician dispatches are required outside of an MSA, Qwest met 100% of its repair commitments in 5 of the last six months, and provided parity service in all 6 months. Utah Checklist Item Format MR-9 at p. 90. When no technician dispatch is required, Qwest met between 93% and 100% of such repair commitments in each of the last 6 months, which was at parity in 5 of those months.

Combining these three categories of information together (no dispatch, dispatch within MSAs and dispatches outside MSAs the data shows the following:

Month	CLEC Results	Retail Results
Feb. 2002	88.4%	93.4%
March 2002	91.2%	94.7%
April 2002	97.1%	94.9%
May 2002	90.5%	95.3%
June 2002	94.9%	95.4%
July 2002	89.8%	94.1%
Aggregate	92.2%	96.5%

Thus, while there are a few percentage points difference between wholesale and retail, Qwest meets over 90% of its repair commitments on UNE-P-POTS and, overall, Qwest's repair of these types of circuits is strong.

B. UNE-P-Centrex 21

For UNE-P-Centrex 21, it is noteworthy that CLECs only have 1834 such circuits in operation in Utah as of July 2002. See Utah Checklist Item Format MR-8 at p. 114. In comparison, CLECs has had as many as 17,197 UNE-P-POTS circuits in service in Utah. See Utah Checklist Item Format MR-8 at p. 92. Thus, UNE-P-Centrex 21 is less than 10% of the overall UNE-P circuits in service in Utah. See Pa. 271 at ¶90, wherein the Commission found that "Verizon's performance with respect to [certain] performance measures for high capacity loops has been poor in Pennsylvania. [Specifically,] Verizon's installation intervals for competitive LECs are consistently longer than those for its retail customers, and Verizon has missed a significant percentage of appointments to provision high capacity loops for competitors. Nonetheless, the Commission concluded that "[g]iven the relatively low volume of orders for high capacity loops compared to all loop types, we cannot find that Verizon's performance for high capacity loops warrants a finding of checklist noncompliance for all loop types."

Low volumes alone should alleviate the Commission's concern about repair appointments met for UNE-P-Centrex 21. However, again, Qwest's overall repair history shows that Qwest is repairing UNE-P-Centrex 21 at a high level of quality. The data shows:

- Qwest cleared a vast percentage of out of service troubles within 24 hours, and always at parity with Qwest in each of the last six months. This was true irrespective of whether or not a technician dispatch was required. Utah Checklist Item Format MR-3 at pp. 110 and 113. When no technician dispatch was required, in each of the last six months Qwest cleared between 100% of such troubles within 24 hours.

- Qwest cleared all troubles in a mean time to restore, well below 24 hours, and always at parity with retail performance. This was true irrespective of whether a technician dispatch was required. Utah Checklist Item Format MR-6 at pp. 110 and 113. When no technician dispatch was required, in each of the last six months Qwest cleared all troubles in an average of just over 7 hours or less.

- CLECs also experienced a comparable percentage of repeat troubles on UNE-P-Centrex 21 lines irrespective of whether a technician dispatch was required. When "no trouble found" tickets are excluded, Qwest's performance data shows that the repeat trouble metric is at parity each of the last 6 months. Utah Checklist Item Format MR-7* at pp. 110 and 114.

- The overall trouble rate for UNE-P-Centrex 21 is always 1.2% or less. Utah Checklist Item Format MR-8 at p. 114.

As to repair appointments met, the Commission again expressed concern about repair appointments that require the dispatch of a technician inside of an MSA (MR-9A). There, Qwest failed to meet parity in 3 of the last 6 months; however, in the three months below standard, Qwest completed a grand total of 38 repair appointments. Qwest met 23 of those 38 appointments. This low volume of repair appointments is simply too small a sample size to evaluate Qwest's repair capability. When all of the performance measures are analyzed collectively, Qwest is repairing UNE-P-Centrex 21 lines at a high level of quality.

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

Sincerely,

Hance Haney

cc:

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