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September 5, 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:

Qwest hereby replies to a request from the Wireline Competition Bureau for further information concerning the prioritization of Telephone Number ("TN") migration and migration as specified according to the Qwest Change Management Process ("CMP") and inclusion in subsequent Interconnect mediated Access ("IMA") software releases.

The targeting of the 2 Change Requests (CRs) for IMA release 12.0 in April 2003 is a product of the negotiated CMP.

Both of these CRs were submitted in the middle of June. IMA 10.0 was implemented the weekend immediately following the submission. The prioritization of CRs for inclusion in IMA 11.0 (to be deployed in November 2002) had already been conducted as well. CRs submitted after the prioritization for the next release has occurred, are eligible for the next subsequent release unless a CLEC or Qwest requests exception handling.¹

The rankings of 2nd and 19th were the result of the CLEC prioritization for IMA release 12.0 specifically. The CMP process does contain a provision for "carry-over"

¹ On August 23, 2002, WorldCom did submit an exception request, SCR082302-01EX (Exception Request to Implement Multiple CRs Prior to IMA 12.0), requesting these two CRs be implemented by 12/31/02. Qwest noticed the CMP community and scheduled the exception vote for the September CMP meeting. Subsequently, WorldCom requested an additional meeting to discuss the exception further prior to the vote. That meeting will occur the week of September 9, 2002.

prioritization. When CRs are ranked, they are ranked for a specific release of IMA. Should a CR be prioritized too low for inclusion in the release, it will be prioritized again for the next release. This gives CLECs and Qwest the opportunity to re-prioritize the change in the context of any remaining CRs as well as any additional CRs that have been initiated since the last prioritization.

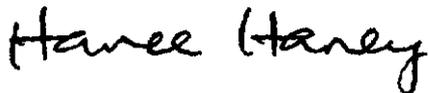
Once CRs have been prioritized, the next step in the CMP calls for Qwest to define business and functional specifications. The specifications are completed on a per CR basis, in priority order. During this phase, any CRs which have affinities and may be more efficiently implemented together will be discussed with the CLECs. Qwest will also present any complexities, changes in CR size, or other concerns that may arise during this phase which would impact the implementation of a CR.

At the conclusion of this phase, Qwest will present packaging options (if more than one option is available) for implementing the release CRs. Packaging options are defined as different combinations of CRs proposed for continuing through the next phase of development. Options may be identified due to affinities in candidates, or other constraints which prevent some CRs from being implemented but allow others to be completed. If more than one option is available a vote will be taken. The option with the largest number of votes will continue through the design phase of the development cycle. The discussion regarding packaging options for the IMA 12.0 Release is planned for November 21, 2002.

After design, Qwest will present a final list of CRs which can be implemented. These CRs become the committed CRs for the release. The discussion regarding committed CRs for IMA 12.0 is planned for December 19, 2002. Only then, will Qwest be able to determine exactly which prioritized CRs will be included in the IMA 12.0 Release. As described above, any CR that does not get included in the IMA 12.0 Release will be subject to prioritization for the IMA 13.0 Release, targeted for implementation in August 2003.

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

Sincerely,



cc:	M. Carowitz	P. Baker	J. Stanley	J. Jewel
	E. Yockus	C. Post	S. Vick	J. Myles
	G. Remondino	P. Fahn	J. Orchard	S. Oxley
	R. Harsch	B. Smith	C. Washburn	G. Cohen