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September 6, 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 the following questions from the Wireline Competition Bureau.

QUESTION:

Clarify whether Qwest allows a CLEC to prequalify Qwest voice customer for a CLEC data service on a line-shared basis.

RESPONSE:

Qwest provides CLECs with the capability to pre-qualify a new Qwest voice customer as soon as the service is turned up for the customer. A CLEC can use this capability to pre-qualify a new Qwest voice customer for data service on a line-shared basis.

The LFACS database is the source of data for the Loop Qualification Database (LQDB), which is used for both wholesale and retail queries. LFACS refreshes the loop make-up information in the LQDB by wire center on a rolling monthly basis. In other words, 1/20th of the wire centers are updated in each nightly refresh run, with the entire set of wire centers completing within a 30 calendar day period.

In the 8.0 IMA Release, which was deployed in August, 2001, Qwest implemented a new capability, a "recent changes" check to the LQDB. Each time the LQDB receives a query for loop make-up information or qualification, it will send a query to LFACS to determine

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if there has been a change to LFACS for the queried telephone number or address that occurred after the regularly scheduled refresh for the applicable wire center. A change to LFACS can occur when new service has been installed or existing service has been moved or changed. If a change has occurred and there is new or changed data in LFACS, the new or changed data in LFACS is populated in the LQDB and provided in the response. The "recent changes" check will assure newly installed service will be immediately added to the LQDB.

During the ROC third party test, KPMG did observe this capability in action. In sections 2.1.2 and 2.1.3 of the Test 12.7 Final Report, KPMG included a paragraph entitled "System Performance/Database Updates" where they described the functionality as follows:

"The LFACS database is Qwest's central repository for loop data. It serves as the source database for the loop data in the LQDB, which is updated with revised LFACS data on a nightly basis. The two databases are synchronized each month. As part of the loop qualification query process, the LQDB also queries a 'recent changes' field in the LFACS database. If this query indicates that the LFACS information has been updated, the new LFACS information is populated into the LQDB, and is used as the basis for the loop qualification query."

QUESTION:

Regarding Eschelon's complaint concerning the Qhost system – Does Qwest have an ISP and if so does it use Qhost?

RESPONSE:

Qwest does offer DSL Internet services to subscribers under the Qwest.net brand name.

Qwest.net does use QHost (a host information website). Qwest.net utilizes QHost in the same manner and receives the same services that are provided to all ISP and Business DSL Hosts, including Eschelon.

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

Sincerely,

*Hancee Hancee*

cc: M. Carowitz                      P. Baker                      J. Stanley  
E. Yockus                              C. Post                        S. Vick                        J. Minkoff

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