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REDACTED - FOR PUBLIC INSPECTION

RECEIVED

September 3, 2002

SEP - 3 2002

Ex Parte

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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 additional documentation that Qwest's policies and procedures for provisioning EELS ensure that competitive LECs will have nondiscriminatory access to EELs as they begin to order them in greater volumes. The Bureau requested record cites specific to the four application states where the application state commissions make findings regarding Qwest's provisioning of EELs (including states' intent to monitor Qwest's performance on this topic).

Qwest has detailed processes and procedures in place concerning the provisioning of EELs. Those processes were reviewed by KPMG during the OSS Test. In closing Observation 3054 insofar as it concerned EEL documentation, KPMG concluded that "KPMG Consulting has reviewed the four updated documents provided by Qwest and agrees that the discrepancies with the testing parameters, as itemized in our previous response, have been corrected." Attached hereto are the process documents that KPMG reviewed during the test that it deemed sufficient.

Of the four application states, only two, Washington and Utah, had any EEL volume to consider. Those states evaluated Qwest's overall performance as it related to UNE Combinations and found Qwest's overall performance adequate. Neither state commission specifically discussed Qwest's EEL performance. Nonetheless, in each of the four application states, Qwest's PAP contains OP-3 (commitments met) for EELs and a failure to meet the 90% benchmark will result in automatic fines and penalties.

Marlene H. Dortch

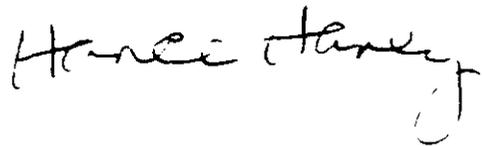
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The twenty-page limit does not apply as set forth in DA 02-1390 and DA 02-1666.

Sincerely,



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