HOGAN & HARTSON
L.L.P.

Writer's Direct Dial:
(202) 637-3678

COLUMBIA SQUARE
555 THIRTEENTH STREET, NW
WASHINGTON, DC 20004-1109
TEL (202) 637-5600
FAX (202) 637-5910
WWW.HHLAW.COM

October 11, 2002

BY ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: **ERRATA**
WC Docket No. 02-314
Application of Qwest Communications International Inc.
Consolidated Application for Authority to Provide In-Region, InterLATA Services in Colorado, Idaho, Iowa, Montana, Nebraska, North Dakota, Utah, Washington and Wyoming

Dear Ms. Dortch:

Submitted herewith on behalf of Qwest Communications International Inc. are clarifications to certain materials included in the above-referenced application, filed on September 30, 2002.

1. Revised page 11 of the Supplemental Brief.

The first full paragraph on page 11 of the Supplemental Brief contains typographical errors in its second and third sentences. Please substitute "QLDC" for "QCC" as shown in Attachment 1, which replaces page 11 of the Supplemental Brief. This conforms with the cited portions of the Brunsting QLDC Declaration and the Schwartz Supplemental Declaration, which correctly refer to QLDC when describing the separate books, records, and accounts of QC and QLDC.

2. Clarification of Footnote 4 of the Declaration of Judith L. Brunsting, Section 271(d)(3)(B), Compliance with Section 272 by Qwest LD Corp.

The Brunsting QLDC Declaration includes a footnote stating that there are no Incumbent Local Exchange Carriers ("ILECs") affiliated with Qwest LD Corp. other than Qwest Corporation. To be clear, Qwest Corporation has two wholly owned subsidiaries that also provide services as ILECs: (1) Malheur Home Telephone Company, which provides services in rural areas of Oregon; and (2) El Paso County Telephone Company, which provides services exclusively in rural Colorado.

Respectfully submitted,

Hogan & Hartson L.L.P.

By: Douglas A. Klein

Peter A. Rohrbach
Mace J. Rosenstein
Douglas A. Klein

Attorneys for Qwest Communications International Inc.

Enclosures

cc (by e-mail): E. Yockus, M. Carowitz, G. Remondino, J. Myles, R. Harsch, B. Smith, J. Jewell, P. Baker, S. Vick, C. Post, P. Fahn, J. Orchard, C. Washburn, S. Oxley

ATTACHMENT 1

Revised Page 11 for Inclusion in the Supplemental Brief

event that QLDC were to acquire facilities, it would operate, install, and maintain its own network, either directly or by contracting with third parties that are not affiliated with QC. Brunsting QLDC Decl. ¶¶ 19-20; Schwartz Supplemental Decl. ¶¶ 21-24.

272(b)(2): QLDC maintains its books, records, and accounts in the manner prescribed by the Commission that are separate from the books, records, and accounts of QC. QLDC has established and maintains a chart of accounts that is separate from that of QC. QLDC maintains expenditure controls to ensure that funds are expensed and accounted for properly. Brunsting QLDC Decl. ¶ 21a-i; Schwartz Supplemental Decl. ¶¶ 25-32. QLDC and QC use separate general ledger accounting software maintained at different locations. Brunsting QLDC Decl. ¶ 21f; Schwartz Supplemental Decl. ¶ 27.

QLDC maintains its books, records, and accounts in accordance with GAAP. Because it is a new company, QLDC's books, records, and accounts are not subject to past accounting irregularities, and the Commission can be assured that its books, records, and accounts will be maintained in accordance with GAAP. The records of the Qwest I and Qwest II proceedings show the measures that QCII, under the leadership of Oren Shaffer, who has been Chief Financial Officer of QCII since July 2002, has put into place to prevent, detect, and correct accounting irregularities in the future. Mr. Shaffer — who served as Chief Financial Officer of Ameritech for six years and as Chief Financial Officer of Goodyear Tire and Rubber Company before that — devoted significant time and effort to the question of QCII's past practices in accounting for the kinds of transactions identified in its July 29, 2002 SEC Form 8-K. Under his supervision and that of QCII's new Senior Vice President – Accounting and Financial Operations, QCII completed a two-month process of reconciliation involving approximately 4,500 individual accounts in QCII's general ledgers (including those of QC and QCC), and