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October 22, 2002

Errata

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Room CY-B402
Washington, D.C. 20554

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

Dear Ms. Dortch:

On October 9, 2002, AT&T Corp. ("AT&T") filed comments in opposition to Qwest's 9-state section 271 application. Those comments include a declaration by Michael Lieberman (Tab L to AT&T's Comments), which correctly shows that the residential margins available to new entrants in Washington (excluding the entrants' internal costs of entry, which exceed \$10) is \$6.76. However, that value was inaccurately transcribed into AT&T's Comments. As a result, AT&T's comments (page 79) erroneously state that the residential margin available to new entrants in Washington is \$.76. Thus, the value \$.76 on page 79 of the Comments of AT&T should read \$6.76.

In addition, the Comments of AT&T and the attached Declaration of Lee L. Selwyn demonstrate that many of Qwest's non-tariffed products and services are not eligible for "prevailing price valuation" because Qwest does not sell any of those products or services to unaffiliated third parties. In support of that statement, AT&T relied on Commission rule 47 C.F.R. § 32.27(d), which states that a BOC qualifies for prevailing price valuation for non-tariffed products or services only if sales for those products or services encompass greater than 50 percent of the total quantity of such products or services sold by the BOC. *See* AT&T

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Comments at 17, 33, 35, 36; Selwyn Decl. ¶¶ 13-17, 22. It recently has come to AT&T's attention that the 50 percent threshold was changed to 25 percent on August 6, 2002. This change in the Commission's rules has no impact on AT&T's argument or conclusions, because AT&T's argument was based on the fact that Qwest sold *none* of the products and services in question to third parties.

Sincerely,

/s/ Christopher T. Shenk
Christopher T. Shenk

Attorney for AT&T Corp.