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December 3, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for Authorization to
Provide In-Region, InterLATA Service in the States of
Colorado, Idaho, Iowa, Montana, Nebraska, North
Dakota, Utah, Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest"), in response to questions from the FCC staff regarding (i) why billing-only type orders will be excluded from OP-5 from November 2002 onwards, and (ii) the results of OP-5 in Washington for the application months if billing-only type orders are not included, hereby submits for inclusion in the above-referenced proceeding its response to the staff's inquiries.

With respect to the exclusion of billing-only type orders from OP-5, beginning with November 2002 results, OP-5 will begin associating trouble tickets issued within 30 days of inward line activity orders, with orders in the denominator. This change will eliminate trouble tickets associated with non-inward line activity from the measurement. This includes trouble tickets flagged as installation related in legacy OSS that are actually associated with billing only type orders.

The OP-5 metric evaluates the quality of installation of services, focusing on the percentage of average monthly new order installations that were free of trouble reports for thirty (30) calendar days following installation. The OP-5 PID states: "New installation orders used in calculating this performance indicator (appearing in the numerator and the denominator of the OP-5 formula shown below) are all inward orders for the current and previous reporting periods, including Change (C-type) orders for additional lines." A trouble report on a "billing-only" order would not be a trouble report on a "new installation order." It would be an order issued for billing purposes only and since a new line is not being installed a trouble report on it would not be eligible for inclusion in OP-5. Currently, due to existing order writing rules, there are certain circumstances where billing only orders may appear as an inward line order. This subset of billing only type orders will not

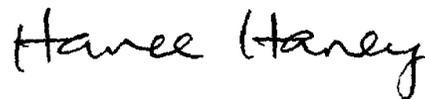
be removed in November and will continue to be counted in the denominator and if a trouble occurs within 30 days, in the numerator. Work is underway to implement a change in order writing procedures to uniquely identify these and allow them to not be included beginning in first quarter 2003.

With respect to OP-5 results in Washington if billing-only type orders are not included, Qwest is not capable of recasting OP-5 results in Washington to exclude billing-only type orders that are written as new connects. Currently billing-only type orders that are written as inward line activity cannot be uniquely identified so as to remove them. Work is underway to implement a change in order-writing procedures to uniquely identify these and allow them to not be included, beginning in early 2003.

The ability to not count trouble tickets issued within 30 days of non-inward line activity orders, including those associated with some of the billing-only orders, has just been developed. Because this is a new development, Qwest is unable to provide OP-5 results excluding trouble tickets for non-inward line activity prior to the November 2002 results.

The twenty-page limit does not apply to this filing.

Respectfully submitted,



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