Qwest.
Spirit of Service

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Melissa E. Newman
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Ex Parte

December 11, 2002

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W., TW-A325
Washington, DC 20554

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing in response to a request from the Wireline Competition Bureau staff for information concerning the internal controls that Qwest maintains to prevent the provisioning of unauthorized in-region interLATA private line services. This letter also describes an additional internal control QCC is presently implementing.

As relayed to me by knowledgeable Qwest personnel, since the merger of Qwest and U S WEST, Inc. on June 30, 2000, QCC has had controls in place to ensure that it does not provide unauthorized interLATA private line services. In particular, QCC's procedures require Qwest employees to input all private line service orders into QCC's "Orion" order entry/billing system. Orion is designed to reject private line service orders with an in-region NPA/NXX end-point location. If an in-region endpoint is entered into Orion in error, the system will not permit the user to continue the order entry program for that particular order. Thus, in the ordinary course the order rejection process is designed to prevent an in-region interLATA private line from being provided.

This order control procedure is supplemented in other ways. First, QCC's sales personnel attended mandatory on-line training regarding Section 271 and certified that they understand the Section 271 restrictions. QCC management reinforces this training with reminders of the importance of Section 271 compliance, and the inability to sell in-region interLATA service. Second, QCC's provisioning personnel also attended mandatory on-line training and they too have certified their understanding of Section 271 limitations. These provisioning personnel are the network employees who actually design and configure private lines. The services cannot physically be installed or turned-up without having first been designed and configured by the provisioners.

These procedures remain in place today. Collectively, the order rejection controls and training work to ensure that Qwest will not deliberately or inadvertently provide prohibited in-region interLATA private line service.

The Cable & Wireless (C&W) private line agreement referenced in our December 3, 2002 letter should not be viewed as demonstrating a significant weakness in these standard controls. That agreement was negotiated and provisioned in a unique manner because it resolved disputes between the companies that resulted in QCC providing C&W with over 120 private line services that were provisioned outside of the standard process.

As discussed in our letter of December 3, Qwest recently determined that while the vast majority of the private lines were out-of-region, four were in-region. Qwest has ceased providing all four of these private line services. Two were terminated on December 9 and the remaining two were terminated on December 10.[1] The problem with the four in-region private lines arose for two reasons. First, Qwest personnel did not adequately review the attachment to the agreement to identify that the location codes for four of the private lines were in-region. Even so, the controls discussed above ordinarily would have provided back-up protection when an order was entered in the Orion system, or when steps were taken to provision the private line. But second, those controls were ineffective in this unique case because the contract was a settlement and the leases were not ordered through Orion. As a result, the order entry controls did not prevent activation of the interLATA service. Based on this analysis, an additional step is now being added to the QCC dispute resolution approval process to require that any associated private line orders be successfully entered into the Orion system before a settlement is effective. In addition, Qwest is in the process of retraining the individuals involved in these provisioning and review processes.

Qwest does not anticipate a reoccurrence of these unique circumstances.

The 20-page limitation does not apply to this ex parte statement.

Sincerely,

Melissa E. Newman

[1] Melissa Newman and Dana Filip (Qwest Wholesale Services Senior Vice President) informed Carol Mattey of the Wireline Competition Bureau via a voice mail message late on December 9, that an additional day, until December 10, 2002, was necessary for C&W to avoid service interruption to its customers.