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February 14, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, D.C. 20554

**Re: Application by Qwest Communications International Inc.  
for Authority to Provide In-Region InterLATA Services in  
New Mexico, Oregon, and South Dakota;  
WC Docket No. 03-11**

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") made an *ex parte* presentation yesterday afternoon to the Wireline Competition Bureau ("WCB") staff regarding the proceeding referred to above. WCB staff members participating in the meeting included Deena Shetler, Bill Dever, Kim Cook, John Copes, Douglas Galbi, Sherille Ismail, Diana Lee, Marvin Sacks, and Jeff Tignor. Qwest representatives participating in this meeting included Hance Haney and the undersigned, as well as Tom Freeberg, Jeff Owens, and Jerry Thompson participating by telephone conference.

The purpose of the meeting was to preview Qwest's responses in its upcoming reply comments in this proceeding to AT&T's arguments regarding (1) entrance facility charges for interconnection trunks and dedicated transport, and (2) a dispute between AT&T and Qwest concerning compensation for "transit" traffic carried over switched access trunks in New Mexico.

With respect to the first issue, Qwest representatives showed that Qwest's entrance facilities transport rate structure and pricing fully comply with all applicable FCC rules, as the Commission has already concluded, and as set forth in further detail in the attached hand-out materials. Qwest representatives also pointed out that (i) the existing entrance facilities transport rate structure is

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familiar and widely-accepted in the telecommunications industry; (ii) entrance facility charges are optional, in that CLECs have the option of using several different methods of interconnection and can avoid paying entrance facilities charges if they choose to configure their networks to do so; and (iii) such charges are reciprocal, in that CLECs that opt to provide entrance facilities themselves rather than using Qwest's facilities have the right to compensation under the SGATs.

With respect to AT&T's argument over "transit" traffic in New Mexico, Qwest explained that this is a two-party dispute over the interpretation of a specific interconnection agreement between AT&T and Qwest. The interconnection agreement at issue was included with the application in this proceeding at Attachment 5, Appendix L - New Mexico, Vol. 1, Tab 5 (AT&T Agrmt&Amd 1 and 2.pdf), and is also attached to this filing. The agreement provides that local transit traffic is to be carried over separate trunk groups. The dispute concerns the proper rates that Qwest may apply when AT&T improperly commingles such transit traffic with switched access traffic and other local traffic on switched access trunks. Qwest applied access charges to such transit traffic for several years. *Cf. Petition of WorldCom, Inc. Regarding Interconnection Disputes with Verizon Virginia Inc.*, CC Docket No. 00-218, DA 02-1731, ¶ 117 (WCB, rel. July 17, 2002). A few months ago, Qwest inadvertently billed AT&T TELRIC rates for this traffic, but later corrected this billing error. AT&T's responded by raising this dispute, for the first time, in its comments on this Section 271 proceeding. It is well-settled that resolution of such two-party interconnection disputes is beyond the scope of Section 271 proceedings.

If you have any questions, please contact me. The twenty-page limit does not apply to this submission.

Respectfully submitted,



David L. Sieradzki  
Counsel for Qwest Communications  
International Inc.

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Enclosures

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