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March 6B, 2003

**EX PARTE**

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

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

Dear Ms. Dortch:

This letter and its attachments are being provided by Qwest Communications International Inc. ("Qwest") at the request of the Wireline Competition Bureau ("Bureau"). The Bureau has requested that Qwest explain the change in commercial performance data between the January 29, 2003 report and the February 28, 2003 report for OP-5 (UNE-P Centrex) for the month of November 2002 in Oregon.

As explained in the February 28, 2003 Summary of Notes (copy attached), the OP-5 results for November 2002 were re-run, because Qwest discovered that "some trouble tickets for Zone-type products were not captured." Qwest made this discovery in conjunction with having recently implemented improvements to the OP-5 measurement process (see Declaration of Michael G. Williams, Commercial Performance, at ¶ 63 and n. 49). The results based on the improved OP-5 programming were first reported on January 29, 2003. That report contained results through December 2002, including the re-run of November 2002 results based on the improved programming. Also, while correcting the programming for trouble tickets that were not captured, Qwest identified a supporting service order file that should have been updated in running the improved OP-5 results as first published in the January 29, 2003 report (i.e., in the first re-run of the November 2002 results). The referenced/attached Summary of Notes reports the actions taken in response to these discoveries as, "Corrected the programming, updated necessary files, and re-ran Nov & Dec 02 results." The changes in results

Marlene H. Dortch

March 6, 2003

Page 2

arising from this latter re-run, when comparing the January 29, 2003 report with the February 28, 2003 report, were minor in terms of any impact on parity determinations. Specifically, the affected November 2002 OP-5 results were as follows (where there was CLEC order activity to report):

Product	States Affected	Per 29 Jan Report		Per 28 Feb Report		Effect on Parity Determination
		CLEC	Retail	CLEC	Retail	
UNE P (Centrex)	OR	91.03%	97.27%	Same	94.55%	Not Met to Met
Resale Basic Rate ISDN	OR	100%	100%	Same	93.91%	None
PBX	NM	100%	91.67%	Same	87.50%	None
	OR	100%	100%	88.89% <sup>1</sup>	Same	None
Unb. Loop-2 Wire Non-loaded	NM	98.00%	94.87%	Same	89.74%	None
	OR	94.19%	93.91%	Same	87.83%	None
LIS Trunk	NM	100%	100%	Same	96.55%	None
	SD	100%	100%	88.89% <sup>1</sup>	Same	None
Unb. Loop-ISDN-capable	NM	95.00%	94.87%	Same	89.74%	None
	OR	94.59%	93.91%	Same	87.83%	None

As this demonstrates, the changes in the re-run reported in the OP-5 results for November 2002, as reported in the February 28, 2003 report, affected only one parity determination, changing it from "not met" to "met" (as noted above in the example provided in the question).

Respectfully Submitted,

*Hancee Hancee*

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<sup>1</sup> This difference was caused by one trouble ticket that was captured in the February 28, 2003 run, (but not in the January 29, 2003 run) against a volume of nine newly installed orders. (This explanation applies, separately, to both the Oregon PBX product and the South Dakota LIS Trunk product).

Marlene H. Dortch

March 6, 2003

Page 3

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