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March 10A, 2003

EX PARTE

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, 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”) submits this filing at the request of Commission staff to respond to four claims made by WorldCom regarding Qwest’s Daily Usage File (“DUF”) processing.¹ As explained more fully below, none of the issues raised by WorldCom should prevent the Commission from finding that Qwest meets the requirements of Section 271.

WorldCom’s first claim is that Qwest’s DUF uses several different codes for “pay per use” features, making them difficult to identify.² Qwest’s DUF uses different codes for “pay per use” features because industry standards assign multiple codes for them. Specifically, the EMI guidelines used to create DUF records require that the value for the “Type of CLASS Feature” field come straight from the AMA record provided by the network switch.³ The AMA record, in turn, contains all of the values (or codes) WorldCom identifies (033, 061, 063, 067 and 069).⁴ Qwest merely passes the value

¹ See Reply Comments of WorldCom, Inc., WC Docket No. 03-11, February 27, 2003, (“WorldCom Reply Comments”) at 11-12; *see also* Reply Declaration of Sherry Lichtenberg, WC Docket No. 03-11, February 27, 2003, (“Lichtenberg Reply Declaration”) ¶¶ 36-41.

² See WorldCom Reply Comments at 11; Lichtenberg Reply Declaration at ¶ 37.

³ EMI guidelines for the Type of CLASS Feature state, “These values and definitions are taken from the CAFD AMA Table 415 CLASS Feature Code and Table 12 Service Feature Lists.” See ATIS/OBF-EMI-020, January 2003, at 4-181.

⁴ The Telcordia Comptroller’s Automated Message Accounting Format Description (CAFD) definitions for Table 415 for Class Feature Codes defines the value 033 as, “Automatic Callback (AC) reactivation – delayed processing resulting in call setup,” 061 as, “AR [Automatic Recall] activation -

recorded in the switch (i.e., the code) to the CLEC on the DUF. This provides WorldCom with a parity-level view of the information recorded by the switch for this field. WorldCom's Reply Comments seem to suggest that WorldCom would prefer that a single code be assigned for "pay per use" features. If this is the case, then WorldCom should petition the relevant industry fora to have the standard changed.

WorldCom's second claim is that Qwest improperly rates certain "pay per use" calls on the DUF, which, according to WorldCom, should be rated only by CLECs.⁵ But the industry's EMI guidelines permit Qwest to send either rated or unrated "pay per use" records to CLECs. Qwest's Wholesale Website specifically informs CLECs that Qwest sends rated records on the DUF, including the 010119 ("pay per use") record to which WorldCom refers.⁶ Qwest transmits rated "pay per call" information on the DUF whenever another company's rates apply to a record, or whenever the originating, terminating and billing number are not all in the same state. But these are rare conditions. Regardless, CLECs have the ability to re-rate any records sent by Qwest. That WorldCom designed its systems to simply reject rated "pay per call" records is not something for which Qwest can be – or should be – accountable.

WorldCom's third claim is that Qwest's DUF records "do not contain a 'Bill To' number, that is the number the customer has dialed."⁷ As a result, WorldCom asserts, its systems reject certain Qwest DUF records because those systems are programmed to identify the "Bill To" number for processing. It is not entirely clear to Qwest what WorldCom is referring to, because the "number the customer has dialed" typically is not the "Bill To" number. Generally, three types of telephone numbers are populated in a DUF record: (1) the originating number, (2) the terminating number, and (3) the billing number. Qwest assumes that WorldCom is referring to the billing number. But, after searching over eight million DUF records that were sent to WorldCom and its affiliates (Z-Tel and Brooks Fiber) over the past month, Qwest found no instances in which the "Billing Number" field was not populated. Although Qwest found instances in which originating or terminating numbers were not populated, the absence of these numbers represented situations in which Qwest's switch did not record the information in the AMA record, which happens on the Retail side as well (e.g., terminating access records where the originating number was not signaled to or recorded by Qwest; rare cases – less than one-tenth of one percent on Worldcom's current DUF – of local measured service records where the switch did not record the terminating number).

delayed processing resulting in timeout," 063 as, "AC activation - delayed processing resulting in call setup," 067 as, "AC activation - delayed processing resulting in timeout," and "AC activation - delayed processing ended by customer deactivation."

⁵ See WorldCom Reply Comments at 12; Lichtenberg Reply Declaration at ¶ 38.

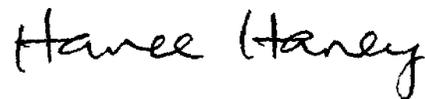
⁶ See www.qwest.com/wholesale/clecs/duf.html.

⁷ See WorldCom Reply Comments at 12; Lichtenberg Reply Declaration at ¶ 39.

WorldCom's fourth and final claim pertains to Directory Assistance Complete a Call ("DACC") records. Specifically, WorldCom claims that Qwest's DUF erroneously designates certain DACC calls as "collect calls."⁸ WorldCom did not specify in which of the application states it is receiving DUFs with DACC designated as "collect calls." Nevertheless, after examining WorldCom's DUF files, for the regions which include New Mexico and Oregon,⁹ over the past month to assess the validity of WorldCom's claim, Qwest could not find a single example of a DACC record showing the "Message Type" set to "Collect." Rather, every DACC record in WorldCom's DUF correctly identified such calls as "Sent-Paid." Thus, this is not an issue in the Application states.

The twenty-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,



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⁸ See WorldCom Reply Comments at 12; Lichtenberg Reply Declaration at ¶ 40.

⁹ Qwest did not investigate WorldCom's DUF for South Dakota because there is no separate DACC record. DACC is included on the basic Directory Assistance record in that state.