



April 1, 2003

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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

Dear Ms. Dortch:

This *ex parte* letter responds to a request from Wireline Competition Bureau staff for a breakdown of the types of rejects that WorldCom has received in the Qwest region. This breakdown demonstrates that the two primary types of rejects that Qwest has transmitted relate to feature activity and address validation. These are the two areas in which Qwest's systems are vastly more complex than those of other BOCs and in which its documentation flaws are most critical.

Between February 1 and March 21, 2003, WorldCom transmitted 89,377 transactions to Qwest. Of these, 72% rejected. Many of the transactions rejected for multiple reasons. By analyzing the reject codes and descriptions of all the responses that Qwest returned, WorldCom determined that 64% of the rejects related to feature activity and 23% related to address validation. Because many different problems that WorldCom has encountered relate to feature activity, WorldCom performed a further breakdown of this category. Sixty-two percent of the feature-related rejects that WorldCom received were for code and reason WO 999 ("Can not add existing USOCs, XXX already on the account"). In other words, the transactions rejected because WorldCom ordered certain features without designating them as features the customers already had. As WorldCom has previously explained, WorldCom often was unable to determine what features a customer already had because of a number of Qwest documentation flaws regarding the format of its CSRs, including: (1) Qwest's failure to document the location of telephone numbers for single line accounts; (2) Qwest's failure to document that feature activity for different lines will be interspersed on multi-line accounts; (3) Qwest's failure to provide a list of class-of-service USOCs; and (4) Qwest's failure to document that CSRs would often contain seven-digit "forward to" numbers even though ten-digit numbers were required on the orders.

The other reasons Qwest provided for rejecting transactions based on feature-related issues were similar. Twenty percent of the feature-related rejects were for "RS FA 900" ("change from" must be used in conjunction with "change to"). In other words, WorldCom did not list all of the old features on the account when those features were being changed. The remainder of the feature-related rejects had a variety of specific descriptions, each of which accounted for a relatively small percentage of the feature-related rejects. But at a general level most of these rejects also related to Qwest's complex ordering requirements with respect to features and its failure to document necessary information for such ordering.

In order to determine whether the breakdown of rejects from February 1 to March 21 was consistent with its very recent experience, WorldCom performed a similar breakdown for the week of March 15-21 alone. In that week, 78% of WorldCom's transactions rejected. Of the total reject responses received, 73 % of these rejects were related to feature activity and 18% related to address validation. Approximately two-thirds of the feature-related rejects were again connected to Qwest's requirement that CLECs differentiate between existing features the customer wishes to retain and new features the customer wishes to add -- and its failure to correctly document how to obtain the existing feature information. A software release made by WorldCom on March 21 may reduce the reject levels, but still the complexities of the Qwest business rules and lack of complete, accurate, and reliable documentation leaves WorldCom no alternative but to constantly "tweak" its software as reject reasons are identified and solutions are found through analysis and questions addressed to Qwest.

The reject rates described above essentially preclude WorldCom's entry into the local market. Qwest's application must be rejected until it fixes the OSS problems that indisputably exist.

The 20-page limit does not apply to this filing. Please call me with any questions about this matter.

Sincerely,
/s/
Lori Wright
Associate Counsel
(202) 736-6468

cc: Bill Dever; Kim Cook