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Vice President-Federal Regulatory

June 18A, 2003

EX PARTE

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

Re: WC Docket No. 03-90 - Application by Qwest Communications International Inc. for Authority to Provide In-Region InterLATA Services in the State of Minnesota

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing at the request of Commission staff to respond to MCI's recent statements in the above-referenced proceeding regarding Directory Assistance Call Completion ("DACC").¹

DACC is a service that gives Directory Assistance users the option of being connected to the telephone number sought without having to hang-up and dial that number independently.² In the Qwest region, CLECs can offer DACC to their end users, or, alternatively, block that service so that their end users are not given the option of being connected automatically to the number sought.³

MCI claims that Qwest "did not clearly document how MCI should request that . . . DACC be blocked for MCI customers," and that, as a result, "tens of thousands" of MCI end users today receive DACC service that MCI does not want to offer.⁴ But information about DACC blocking was – and is – clearly delineated in the "Complete-A-Call" section of the PCAT, which, like all other portions of that document, has been available on Qwest's Wholesale

¹ See Letter to Marlene Dortch, Secretary, Federal Communications Commission, from Lori Wright, Attorney, MCI, WC Docket No. 03-90, June 13, 2003 ("MCI Ex Parte") at 2-3.

² See "Complete-A-Call" Product Listing in PCAT, available at <http://qwest.com/wholesale/clecs/features/comcall.html>. DACC is referred to as "Complete-A-Call" in Qwest's Product Catalogue ("PCAT").

³ See *id.* The only part of Qwest's 14-state region in which DACC is not available is in the northern region of Idaho. See *id.*

⁴ See MCI Ex Parte at 2.

Website since March 22, 2002.⁵ The PCAT describes with specificity the Feature Activity Types (Action Codes), Feature Codes (USOCs), and Feature Detail (FID and Data Requirements) that CLECs must use to add or remove DACC blocking from an access line or trunk.⁶ Qwest's Local Service Ordering Guidelines and EDI Developer Worksheets also provide CLECs with detailed information on how LSRs should be populated for various blocking features. Thus, information on how to block DACC for end users has long been available to MCI.⁷

Although documentation describing how to block DACC was available, MCI did not adhere to this documentation when it converted many of its end users from Qwest to MCI accounts.⁸ That is why DACC service today remains unblocked for these MCI end users.⁹ Notably, MCI is the only carrier to have raised this issue, and when MCI brought it to Qwest's attention, Qwest clarified for MCI that the appropriate procedure for resolution would be for MCI to submit a new LSR for each account, which is the standard procedure for adding or removing features on an account. More recently, Qwest offered to develop and implement a one-time application that would add the DACC blocking feature to MCI's existing end user accounts, provided MCI share the cost of this automated solution. Neither of these options appealed to MCI; but, yesterday, after further discussion, the parties reached an agreement that will result in DACC blocking being implemented for all new and existing MCI end users over the next several weeks.

⁵ See Complete-A-Call" Product Listing in PCAT, available at <http://qwest.com/wholesale/clecs/features/comcall.html>.

⁶ See *id.*

⁷ MCI's allegation appears to have arisen out of MCI's experience with Qwest's Operator Services/Directory Assistance Questionnaire ("OS/DA Questionnaire"), which MCI completed on October 21, 2002. Qwest requires all CLECs to complete various questionnaires as part of the interconnection process. See, e.g., OSS Decl. at CLD-OSS-107 (New CLEC Questionnaire Screen Shot); CLD-OSS-126 (Qwest Account Establishment and Account Management Processes). Among them is an OS/DA Questionnaire, which CLECs seeking Qwest-provided OS/DA service are asked to complete to, among other things, indicate their preference for OS/DA branding and end user announcements. The OS/DA Questionnaire asks CLECs to choose one of four call completion announcements that end users will hear at the conclusion of Directory Assistance calls. Apparently, MCI mistakenly believed that by checking the box labeled "No DACC" (which indicates that end users will be provided only with a voice recording of the phone number sought), all of its end user accounts would automatically be subject to DACC blocking. MCI is the only Resale/UNE-P provider to date to have checked the box labeled "No DACC." All others that have completed the OS/DA Questionnaire have requested some form of call completion. Qwest agrees that the OS/DA Questionnaire could have been clearer and Qwest is in the process of clarifying it now that MCI brought the issue to Qwest's attention. Nevertheless, the OS/DA Questionnaire should not have prevented MCI from knowing that it had to proactively block DACC for its end users, as Qwest's PCAT, which governs the order submission process, clearly documented the DACC blocking option and was available at the time MCI completed the OS/DA Questionnaire.

⁸ See MCI Ex Parte at 3.

⁹ See *id.*

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Qwest is providing the information in this letter at the request of Commission staff; therefore, the 20-page limit does not apply to this filing. Please contact the undersigned if you have any questions concerning this submission.

Respectfully submitted,

/s/

Melissa Newman

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