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**Cronan O'Connell**  
Vice President-Federal Regulatory

October 4, 2004

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W., Room TW-A325  
Washington, DC 20554

*Re: In the Matter of Unbundled Access to Network Elements; Review of the  
Section 251 Unbundling Obligations of Incumbent Local Exchange  
Carriers, WC Docket No. 04-313 and CC Docket No. 01-338*

Dear Ms. Dortch:

On October 1, 2004, Melissa Newman, Cronan O'Connell, Robert McKenna and Wendy Moser of Qwest Communications International Inc. ("Qwest"), and Chuck Keller and Christine Crowe of Wilkinson, Barker Knauer, LLP, also representing Qwest, met with Thomas Navin, Gail Cohen, Ian Dillner, Russell Hanser, Marcus Maher, Christina Langlois, Erin Boone, Carol Simpson and Timothy Stelzig of the Wireline Competition Bureau. The purpose of the meeting was to discuss the competitive landscape in the Qwest region and how this information could be overlaid on potential DS1 loop unbundling tests. Qwest faces competition throughout its region – including in small wire centers – from all types of CLECs, including independent telephone companies, cable companies, municipalities as well as IXC and wireless providers. The size of Qwest's serving wire centers do not necessarily correlate to where CLECs compete in the Qwest region. This information must be taken into consideration as the FCC reviews the DS1 loop competitive landscape. Additionally, Qwest discussed the fact that CLECs are not impaired in any instance whereby they are currently using special access and there they should not be allowed to convert any existing special access circuits.

In accordance with Commission Rule 47 C.F.R. § 1.49(f), this *ex parte* letter is being filed electronically for inclusion in the public record of the above-referenced proceedings pursuant to Commission Rule 47 C.F.R. § 1.1206(b)(2).

Sincerely,  
/s/ Cronan O'Connell

cc:  
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