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Federal Communications Commission
Office of Secretary

April 29, 2005

VIA HAND DELIVERY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W., Room TW B-204
Washington, DC 20554

RE: Policy and Rules Concerning the Interstate, Interexchange
Marketplace; Implementation of Section 254(g) of the
Communications Act of 1934, as amended; CC Docket No. 96-61

Dear Ms. Dortch:

On behalf of Qwest Services Corporation, attached is the 2005 certification of compliance with the Commission's geographic rate averaging and rate integration requirements pursuant to 47 C.F.R. §64.1900.

If you have any questions, please contact me.

Respectfully submitted,

Michael B. Adams, Jr.

Enclosure

MBA/kn

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CERTIFICATION OF COMPLIANCE WITH THE SECTION 64.1804 OF THE RULES
OF THE FEDERAL COMMUNICATIONS COMMISSION

I, Robert L. Connelly, having been duly sworn, attest as follows:

I am the Vice President—Deputy General Counsel, of Qwest Services Corporation. Qwest Services Corporation is the corporate owner, either directly or through intermediate subsidiaries, of Qwest Communications Corporation, Qwest Corporation, Qwest Interprise America, USLD Communications, Inc. and Qwest LD Corp. I am authorized to execute this certification on behalf of Qwest Services Corporation and its affiliates.

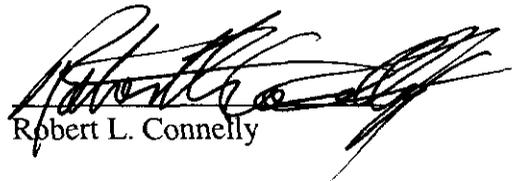
These companies provide interstate interexchange telecommunications services that are subject to 47 USC Section 254(g) and Section 64.1804 of the Rules of the Federal Communications Commission.

I am familiar with the rules and regulations of the Federal Communications Commission concerning rate integration and rate averaging and with the interexchange telecommunications services of these companies.

Pursuant to Section 64.1900 of the Commission's rules, I hereby certify that, to the best of my knowledge and belief and with limited and temporary exceptions caused by the fact that in-region interLATA service must be provided on a temporary basis by Qwest LD Corp, no Qwest interstate offering subject to the certification requirements of Section 64.1900 violates the rate integration or rate averaging provisions of the Telecommunications Act of 1996 or the Commission's implementing rules. This affidavit is also made based on the understanding that: (1) QCC's Qwest Express Platform service, which is a terminating access service purchased by Voice Mail, Broadcast Fax/Satellite/email, Audio Conferencing providers, ISPs ASPs, and Telemarketers, and which is price based on the identity of the terminating LATA, is in compliance with the rate integration and rate averaging rules; and (2) Qwest Choice Long Distance service in Montana is not identical to other states due to conditions placed on it by the Montana PSC.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief based on records currently available.

Dated April 28, 2005.


Robert L. Connelly