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Melissa E. Newman
Vice President – Federal Regulatory

Filed Via ECFS

February 6, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
Room TW B-204
445 12th Street, SW
Washington, DC 20554

Re: EB Docket No. 06-36; Qwest Certification of CPNI Filing
(November 17, 2005) in File No. EB-06-TC-060

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) hereby files its most recent certification regarding its compliance with Section 64.2009(e) of the rules of the Federal Communications Commission (“Commission”).¹ Included with this submission are the Certification and associated statement of Alwin Roberts, Vice President – Sales, for Qwest Services Corporation. Qwest makes this submission pursuant to the Commission’s January 30, 2006 and February 2, 2006 Public Notices.²

If you have any questions concerning this submission, please contact the undersigned at 202-429-3120.

Sincerely,

/s/ Melissa E. Newman

cc: Byron McCoy via byron.mccoy@fcc.gov
Best Copy and Printing, Inc. via fcc@bcpiweb.com

¹ 47 C.F.R. § 64.2009(e).

² *Enforcement Bureau Directs All Telecommunications Carriers to Submit CPNI Compliance Certifications*, Public Notice, DA 06-223 (rel. Jan. 30, 2006); *Enforcement Bureau Opens New Docket for the February 6, 2006, Filing of CPNI Compliance Certifications*, Public Notice, DA 06-258 (rel. Feb. 2, 2006).

COMPLIANCE CERTIFICATE
(Pursuant to 47 C.F.R. § 64.2009(e))

I, Alwin Roberts, Vice President - Sales, for Qwest Services Corporation, hereby certify that I have personal knowledge that Qwest Services Corporation and its subsidiaries have established operating procedures that are adequate to ensure compliance with the Federal Communications Commission's rules set forth at 47 C.F.R. § 64.2001- 64.2009. With respect to this certification, I am relying in part on prior information provided to me in connection with a recent certification done by Mark Pitchford, Vice President Marketing, for Qwest Services Corporation.

Attached hereto as Exhibit 1 (which is incorporated into and made a part hereof) is a statement explaining how Qwest's operating procedures ensure that it is in compliance with the aforementioned rules.

11/17/05
Date



Alwin Roberts
Vice President - Sales

EXHIBIT 1 TO COMPLIANCE CERTIFICATE

Qwest maintains the following operating procedures to ensure compliance with the rules set forth in 47 C.F.R., Subpart U:

1. Qwest employees working with CPNI are trained in its proper use. Detailed training materials have been prepared, and are updated as necessary. Product/marketing management employees are given the detailed training. The training includes instruction for service representatives on how to properly address CPNI issues during inbound calls, and instruction to sales personnel on how CPNI may and may not be used during outbound marketing campaigns. These training materials are used sometimes in face-to-face training sessions with employees, as well with as agents and contractors. Training materials are also posted to Qwest's internal web site for easy access and consultation. Further, on an ongoing basis, targeted, niche training is conducted as needed and CPNI mandates are included in annual employee training. As part of Qwest's training program, sales personnel are instructed to, and do, obtain supervisory approval of any proposed outbound marketing request.
2. Documented disciplinary procedures have been established whereby a potential violation of CPNI rules is investigated, and, where appropriate, results in disciplinary action against an employee.
3. The business units within Qwest maintain a record of their sales and marketing campaigns that use CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, the date and purpose of the campaign, and what products or services were offered as part of the campaign. The records are maintained for a minimum of one year.
4. Qwest's compliance with CPNI rules is overseen by a team of Regulatory Compliance Managers in the Corporate Regulatory Compliance group. These Compliance Managers, under the direction of Qwest's FCC Legal Counsel, have been trained on FCC rules and regulations, including rules relating to CPNI. They are each responsible for assisting particular business units, and they work with the business units to answer questions, provide guidance and determine the need for legal advice relating to CPNI. Matters on which their expertise is sought include training, discipline and supervision of marketing campaigns. The Compliance Managers ensure that necessary information is brought to the attention of Qwest business clients and attorneys, point out issues to help facilitate legal analyses and communicate legal advice to the business units. They respond to business unit questions and requests for information regarding the use or non-use of CPNI. They review all proposed new and substantially modified products and processes for compliance with, among other things, CPNI rules. Compliance Managers read and understand product/process proposals, network diagrams, marketing proposals and business cases. They conduct fact-finding interviews with business units, summarize compliance issues for attorneys and summarize and communicate compliance requirements to the business units. They also investigate and document potential violations of CPNI rules and initiate disciplinary action if appropriate.

5. In order to ensure that CPNI issues are resolved uniformly across the business and in a timely manner, the Compliance Managers conduct CPNI conference calls (usually on a weekly basis) with head CPNI legal counsel for Qwest. When appropriate, members of the business units and other legal counsel also attend these calls. During these conference calls, CPNI issues are discussed, issues are raised, and solutions are reached and/or action plans are established. In addition, the CPNI certifying officer is advised of ongoing CPNI issues.

6. In addition, Qwest's Corporate Ethics and Compliance Group, which includes a Chief Privacy Officer, has expertise in privacy issues that may impact or be impacted by CPNI issues. The CPO, supporting managers and attorneys regularly consult with and advise the Compliance Managers to ensure that they receive accurate legal information and analyses and can effectively implement CPNI rules and regulations.