

LTPA COLLABORATIVE STATUS REPORT

JANUARY 9, 2004

Introduction

On October 10, 2003, the Washington State Utilities and Transportation Commission issued an order in Docket No. UT-033020, In the Matter of the Six-Month Review of Qwest's Corporation's Performance Assurance Plan. Paragraph 8 of the Order directed the parties to file a status report "concerning the status of discussions in the LTPA collaborative" with the Commission by January 9, 2004. According to the Order, parties may file a joint report or separate reports. This LTPA Collaborative Status Report is being filed in response to the Commission's order by the following parties: MCI, AT&T, Covad, Eschelon and Qwest.

LTPA Administration

In early October, 2003, Qwest finalized a contract with John P. Kern, President of Kern & Assoc., Inc. to facilitate the LTPA. On October 24, Mr. Kern solicited proposed changes to the Performance Indicators (PIDs) from any interested party. The parties were directed to identify the PID number the proposal applies to or if a new PID, a short title of the subject of the proposal; identification of the party making the proposal; a complete description of the proposal (including the text for the business rule(s) (if available) that reflects the letter and intent of the proposal) and, a brief explanation as to why the proposing party felt the proposal had merit and should be accepted. Proposals were submitted on November 6, 2003 by Qwest, Covad, Eschelon, MCI and US Link and included proposals to add PIDs, delete PIDs and to modify existing PIDs. All proposals were consolidated into an Issues Matrix which the LTPA uses as a tracking tool to monitor and provide the current status of all proposals.

On November 13, a conference call was held at which time parties were allowed to ask clarifying questions and better understand the various proposals. After all proposals were reviewed, some were deleted as being redundant and others were

consolidated. During this call, the parties agreed to hold conference calls every Thursday from 12:00 – 2:00 PST at which time various PID proposals would be discussed. These calls began on December 4.

On November 17, Qwest hosted an overview of its performance measurements, with the objective of assisting everyone in achieving a level of mastery of the PIDs, how they are structured and how they operate. To accomplish this objective, Qwest provided an aerial view of all PIDs, plus details on key PIDS.

Status of Issues

The Issues Matrix is included as Attachment 1 and shows the status of all issues as of January 8, 2004. As the matrix indicates, substantive discussions began on December 4, with Issue 35, administrative changes to the PIDs. According to Qwest, these changes are intended only to increase the clarity, accuracy and completeness of the PIDs, but not to change the meaning of any PID. The types of changes agreed to include: (1) typos, which can be either a typographical or administrative error; (2) outdated, which identifies information that is no longer relevant to the 12 months of published data that will be reported at the time the PID is finalized and sent to the states for inclusion in the SGATs; and (3) consistency. The consistency category covered such areas as (1) using the same words, phrases or acronyms within a PID, among the PIDs, or between the PIDs and various regulatory documents; (2) replacing references to old systems or processes with current nomenclature; and (3) deleting explanatory notes that are duplicative of the formulas. Based on this discussion, some administrative changes were considered substantive and have been added to the matrix as separate issues (See Issues 14b and 15a). The remaining PID changes were agreed to by the collaborative and will be filed by Qwest before the end of January, 2004.

The LTPA has also reviewed proposals to modify two maintenance and repair PIDs (See Issues 9 and 10). The parties have tentatively agreed to accept Qwest's proposal for Issue 9 pending an analysis by Qwest of its revised proposal using old data.

Discussions regarding Issue 10 continue and Qwest will provide additional information to support its proposal sometime in late January or early February, 2004.

The LTPA began discussing two volume threshold proposals (See Issues 13 and 33). Qwest has proposed that product reporting categories not begin until certain volume thresholds have been achieved. CLECs have recommended that each product offered by Qwest be reported. The parties continue to discuss these issues.

The LTPA has also begun discussing data services (See Issues 25 – 30). These proposals generally request adding separate product categories and standards for data related services (e.g., line splitting). Issue 25 has been agreed to by the collaborative and is now closed. Discussions continue for two other proposals, Issues 26 and 27.

Discussions have yet to be scheduled for all other proposals including new proposals developed during the weekly conference calls (e.g., Issues 35b and 36).

At this time, while many issues continue to be discussed, no party has declared an impasse and therefore no issues are in dispute. However, the parties do expect that there will be certain issues that will be taken to impasse, and will be administered consistent with the LTPA governance documents, which are attached hereto as Attachment 2. Also, the LTPA expects to complete its work by the end of March. To the extent that weekly conference calls are insufficient to complete discussions through to resolution or impasse, parties have agreed to a two-day meeting sometime in late January or mid-February.

Conclusion

The undersigned parties jointly submit to the Commission this LTPA Status Report for purposes of advising it of the status of the discussions of the LTPA collaborative.

Dated: January 9, 2004

Respectfully submitted,

Qwest Corporation (“Qwest”)

Eschelon Telecom, Inc. (“Eschelon”)

Covad Communications Company (“Covad”)

WorldCom, Inc. (n/k/a MCI) “MCI”)

AT&T Communications of the Pacific Northwest, Inc and AT&T Local Services
on behalf of TCG Seattle and TCG Oregon (“AT&T”)