

**BEFORE THE WASHINGTON
UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of)	
QWEST CORPORATION,)	DOCKET UT-073034
)	
Petitioner,)	INITIAL COMMENTS OF
)	ESCHELON TELECOM OF
For Commission Approval of Stipulation)	WASHINGTON, INC.
Regarding Certain Performance Indicator)	
Definitions and Qwest Performance)	
Assurance Plan Provisions.)	
.....)	

Pursuant to Prehearing Conference Order; Establishing Procedural Schedule, Order 02 in the above-captioned proceeding, Eschelon Telecom of Washington, Inc. ("Eschelon") submits initial comments.

1. The names, addresses, and telephone numbers of the persons to whom communications should be addressed are:

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2. On September 12, 2007, Qwest Corporation (Qwest), on behalf of itself and other signatories to the Stipulation regarding Qwest's Performance Indicator Definitions (PIDs) and Performance Assurance Plan (QPAP) that is the subject of the above-captioned proceeding, *In the Matter of Qwest Corporation, Petitioner, for Commission Approval of*

Stipulation Regarding Certain Performance Indicator Definitions and Qwest Performance Assurance Plan Provisions (the PID/PAP Docket), filed a Narrative in support of Settlement Agreement. Eschelon Telecom of Washington, Inc. (Eschelon) is one of the signatories to the Stipulation.

3. On August 31, 2007, Integra acquired Eschelon. Following the acquisition, Eschelon and Integra each remains a legal entity that is a certificated telecommunications provider under the jurisdiction of the Washington Utilities and Transportation Commission (Commission).

4. On September 6, 2007, the Commission issued its Order Accepting, Subject to Conditions, AFOR Carrier-to-Carrier Service Quality Plan and Granting Motion to File Reply to Comments, Order No. 08, in Docket No. UT-061625, *In the Matter of the Petition of Qwest Corporation for an Alternative Form of Regulation Pursuant to RCW 80.36.135 (the AFOR Docket)*. In that Order, the Commission made the following findings regarding implementation of the QPAP as a required component of the AFOR:

- (a) The QPAP shall remain in effect for the full four-year term of the AFOR, unless modified by the Commission.
- (b) The QPAP must remain available to all wholesale carriers in its current form unless modified by the Commission.
- (c) The QPAP terms must apply to all wholesale services provided by Qwest as a substitute for unbundled network elements during the term of the AFOR, unless the affected parties agree otherwise.

5. On October 1, 2007, Qwest accepted the AFOR and the Commission's findings in regard to it.

6. The *PID/PAP Docket* addresses service quality issues affecting wholesale products and services, while the above-noted provisions of the *AFOR Docket*, agreed to by Qwest, address the extension of the QPAP service quality provisions for the term of

the AFOR and the application of the QPAP terms to all wholesale services provided by Qwest as a substitute for UNEs during the term of the AFOR, unless the parties agree otherwise.

7. Eschelon does not consider that the *PID/PAP Docket* and the *AFOR Docket* conflict. To the extent, if any, that any provision of the *PID/PAP* docket may need to be addressed in the future in order to enable both dockets to remain consistent and to be fully implemented, Eschelon expects to participate in such a proceeding.

Dated: October 5, 2007



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